ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT

FOR THE LOS ANGELES MEMORIAL SPORTS ARENA REDEVELOPMENT PROJECT

State Clearinghouse No. 2010041059

PREPARED FOR:

The Los Angeles Memorial Coliseum Commission

PREPARED BY:

Eyestone Environmental

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ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE LOS ANGELES MEMORIAL SPORTS ARENA REDEVELOPMENT PROJECT

I. Introduction

This document is an Addendum to the Environmental Impact Report (EIR) prepared for the Los Angeles Memorial Sports Arena Redevelopment Project (State Clearinghouse No. 2010041059), which was certified by the Los Angeles Memorial Coliseum Commission (Coliseum Commission) on February 2, 2011 (Certified EIR). The Certified EIR analyzed the demolition of the existing Los Angeles Sports Arena (Sports Arena) on an approximately 15-acre site in the southeastern portion of Exposition Park in the City of Los Angeles (Project Site), and the development of two potential options on the Project Site: (1) a multiple-use space that would serve as a public venue for civic gatherings, celebratory and entertainment events (e.g., festivals, carnivals, rallies, and concerts), and other similar uses (Multi-Use Project); or (2) a Major League Soccer (MLS) Stadium with a permanent seating capacity of approximately 22,000 seats and associated amenities such as restrooms, concessions, press facilities, spectator viewing areas, luxury suites and club seating, and locker and dressing facilities (Original Stadium Project). After the Certified EIR was certified by the Coliseum Commission, the Coliseum Commission leased both the Los Angeles Memorial Coliseum (Coliseum) and Sports Arena sites to the University of Southern California (USC), allowing development of those uses approved under the Certified EIR. USC has now agreed with the Los Angeles Football Club (LAFC), which has acquired an MLS expansion franchise, to cooperate with LAFC's efforts to seek approval of certain modifications to the Original Stadium Project in order to develop the LAFC Stadium on the Project Site (Modified Project). The Modified Project would consist of the Original Stadium Project (reconfigured on the Project Site) together with the addition of up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet), including the following uses and floor areas: up to approximately 30,250 square feet of office and conference facility space, including no more than 21,250 square feet of office space; an approximately 36,000-square-foot "World Football" museum; up to approximately 27,750 square feet of team store or other retail space; and up to approximately 11,900 square feet of restaurant uses. The Modified Project also includes signage and lighting programs to support stadium operations.

In accordance with the California Environmental Quality Act (CEQA), the purpose of this Addendum is to analyze the Modified Project's proposed modifications to the Original

Stadium Project and to determine whether implementation of the Modified Project would result in any new significant environmental impacts that were not identified in the Certified EIR, or whether the previously identified significant impacts would be substantially more severe under the Modified Project.

This Addendum demonstrates that all of the potential environmental impacts associated with the Modified Project would be within the envelope of impacts already evaluated in the Certified EIR for the Original Stadium Project. Therefore, the Modified Project would not result in new significant impacts or increase the severity of significant impacts that were previously evaluated and disclosed in the Certified EIR.

II. CEQA Authority for Addendum

CEQA establishes the type of environmental documentation required when changes to a project occur after an EIR is certified. Specifically, Section 15164(a) of the CEQA Guidelines states that:

> *The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.*

Section 15162 of the CEQA Guidelines requires the preparation of a Subsequent EIR when an EIR has been certified or a negative declaration has been adopted for a project and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code (PRC) Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental EIR shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project which will require major revisions of the environmental impact report;

- Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report; or

- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis herein (refer to Section IV, Comparative Analysis of Modified Project Impacts, on page 31), the Modified Project would not result in any new significant impacts, nor would it substantially increase the severity of previously identified significant impacts. In addition, there are no substantial changes to the circumstances under which the Original Stadium Project analyzed in the Certified EIR would have been undertaken, and no new information of substantial importance which was not known and could not have been known when the Certified EIR was certified has been identified. Therefore the minor changes resulting from the Modified Project do not meet the standards for a Subsequent or Supplemental EIR pursuant to CEQA Guidelines Section 15162.

III. Project Description

A. Project Location and Existing Conditions

As shown in Figure 1 on page 5, the approximately 15-acre Project Site is located in the City of Los Angeles approximately 2 miles southwest of downtown, within Exposition Park. The Project Site includes the site of the existing Los Angeles Memorial Sports Arena (Sports Arena), located at 3939 South Figueroa Street, as well as immediately surrounding surface parking and landscape areas. The specific boundary of the irregularly shaped Project Site is shown in Figure 2 on page 6. As shown therein, the Project Site is bounded by Exposition Park Drive (Christmas Tree Lane) to the north, Figueroa Street to the east, Exposition Park Parking Lot 6 to the south, and South Coliseum Drive (Hoover Street) to the west. Regional access to the Project Site is provided by the Harbor Freeway (Interstate 110), located approximately 0.1 mile east of the Project Site. Major arterials serving the Project Site include Vernon Avenue, Martin Luther King, Jr. Boulevard, and Exposition Boulevard in the east-west direction; and Vermont Avenue, Figueroa Street, Hoover Street, and Flower Street in the north-south direction.

At approximately 160 acres, Exposition Park is the largest park in the Central Los Angeles area. It is bounded by Exposition Boulevard to the north, Figueroa Street to the east, Martin Luther King, Jr. Boulevard to the south, and Vermont Avenue to the west. Owned by the State of California and leased by various entities, Exposition Park houses the Coliseum; the Los Angeles Sports Arena (located on the Project Site); the California Science Center; the Dr. Theodore T. Alexander Jr. Science Center School; the California African American Museum; the Los Angeles County Natural History Museum; the Exposition Park Rose Garden; the Wallis Annenberg Building; and the Expo Center, which includes a swim stadium, recreation center, senior citizen center, amphitheater, and pre-school. The Project Site is generally situated in the southeastern portion of Exposition Park. All of Exposition Park, including the Project Site, is located within the City's South Los Angeles Community Plan Area, the eastern boundary of which is Figueroa Street. The Project Site is also within the boundaries of the Coliseum District Specific Plan (Specific Plan). All land uses east of Figueroa Street are located in the Southeast Los Angeles Community Plan Area.

Land uses immediately adjacent to the Project Site include Christmas Tree Lane and adjacent landscaped areas to the north; the Coliseum and adjacent surface parking lots across South Coliseum Drive to the west and northwest; Parking Lot 6 to the south; and commercial/retail uses and surface parking lots fronting the east side of Figueroa Street to the east. Residential uses are also located in the vicinity of the Project Site, including multi-family residential uses fronting Flower Drive to the east, and multi-family

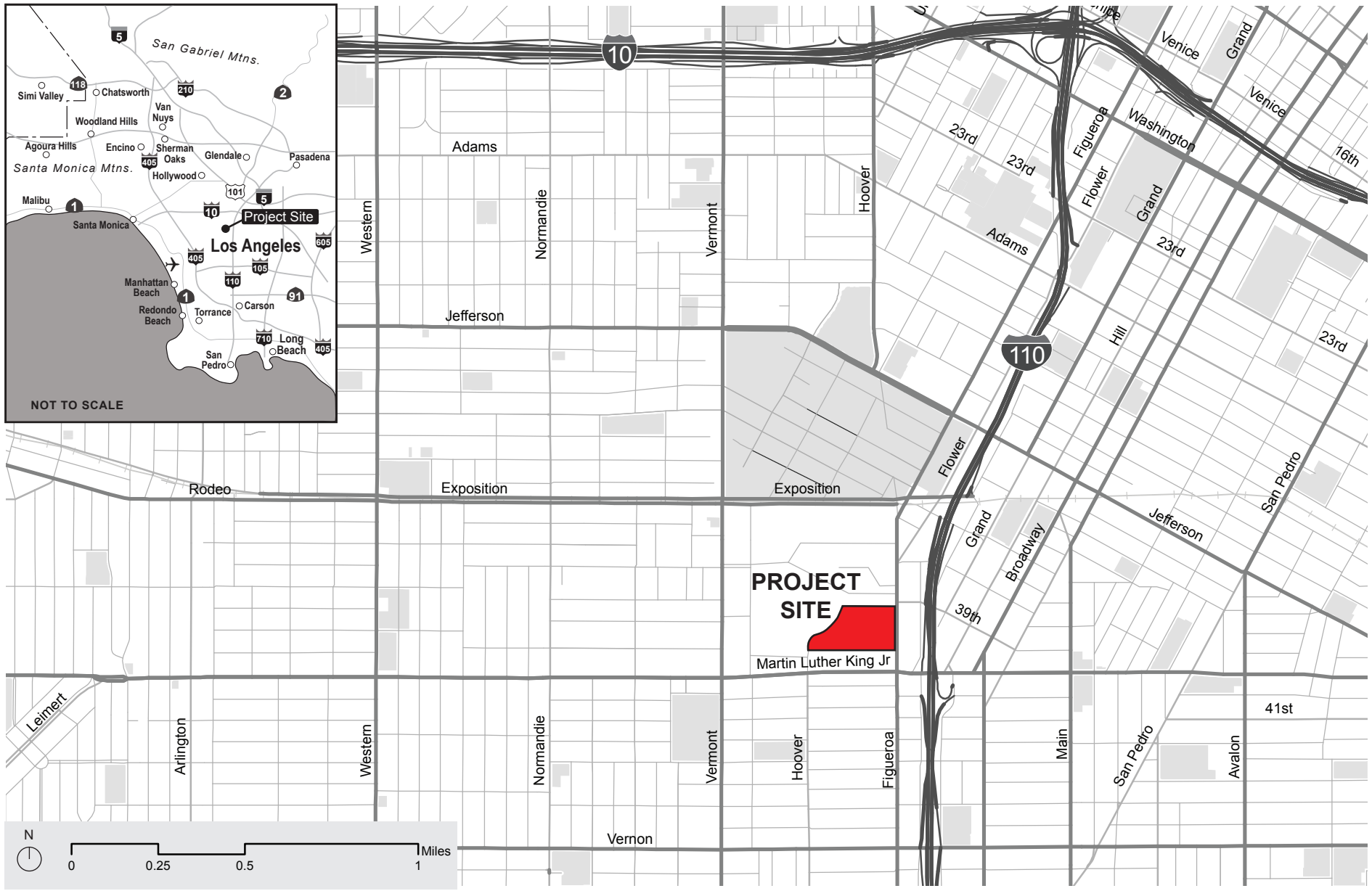

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Figure 1
Regional and Vicinity Map

Source: Google Earth, 2015; Eyestone Environmental, 2015.

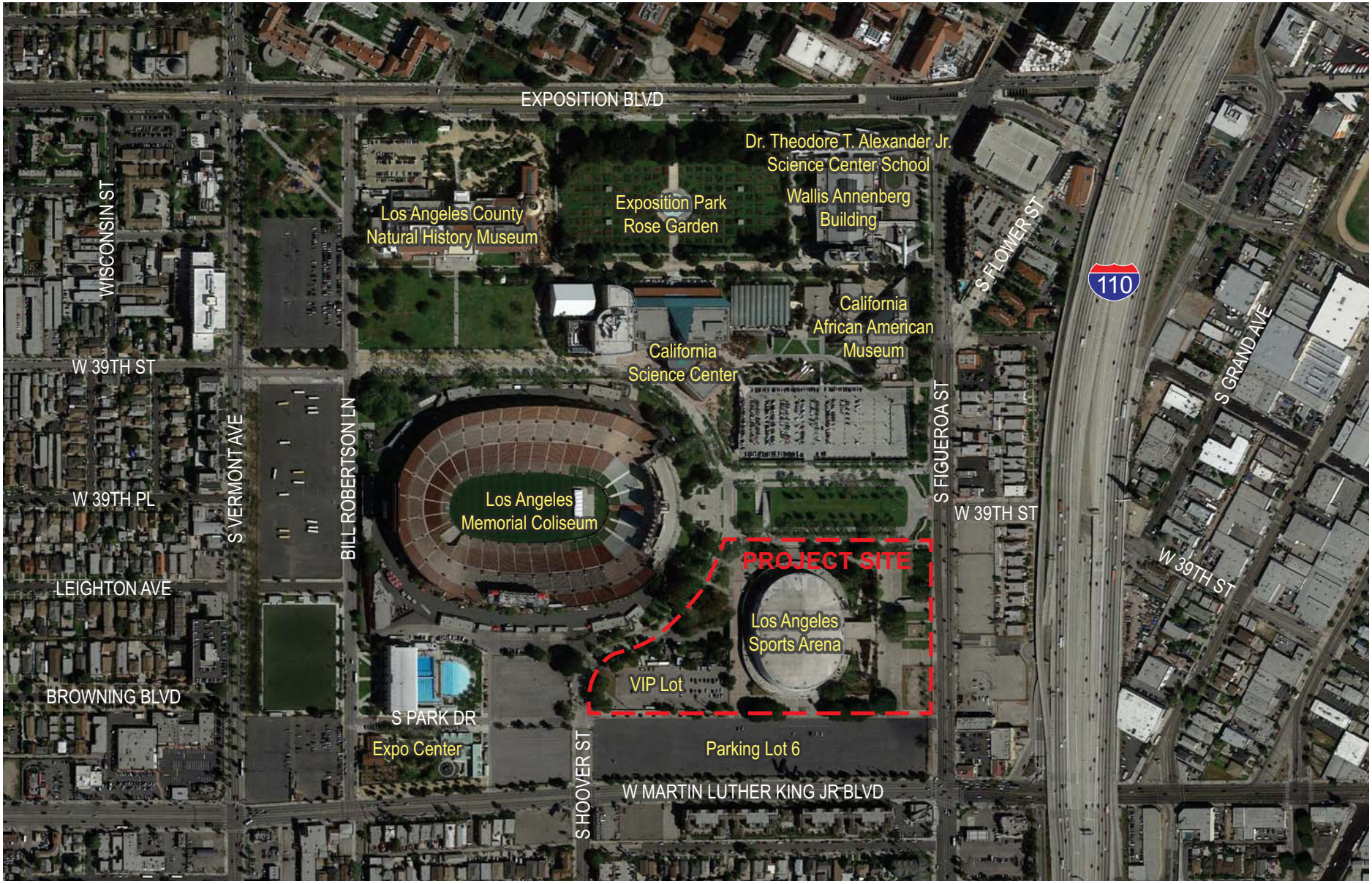

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Figure 2
Aerial Photograph

Source: Google Earth, 2015; Eyestone Environmental, 2015.

residential uses on the south side of Martin Luther King, Jr. Boulevard to the south. In addition, the USC main campus is located north of Exposition Boulevard.

The predominant land use on the Project Site is the 16,740-seat Sports Arena. Since it commenced operations in 1959, the Sports Arena has hosted indoor sporting events as well as other major events including political conventions, concerts, trade shows, and rallies. The Sports Arena hosts weekday and weekend events, with attendance levels ranging from approximately 500 to approximately 55,000 attendees. The Sports Arena is an oval-shaped structure oriented along a north-south axis. It was constructed within a large excavated depression that extends approximately 25 feet below grade level; as such, the seven-story arena extends only approximately 45 feet above grade level. In addition to the Sports Arena, a surface parking lot for VIPs occupies the western portion of the Project Site. The VIP parking lot contains approximately 238 vehicle parking spaces and is accessed from South Coliseum Drive via Martin Luther King, Jr. Boulevard. The Project Site is generally flat, with the exception of the sunken court and seating within the Sports Arena structure, and a sunken landscaped courtyard extending off of the east side of the Sports Arena structure. The Project Site also includes several at-grade plazas and ornamental landscaping.

USC currently leases the Sports Arena, as well as the adjacent Coliseum, from the Coliseum Commission. USC's lease, including extension options, provides USC with the right to possess and use the Sports Arena site through 2054. The USC lease also contemplates the redevelopment of the Sports Arena site with a soccer stadium and associated ancillary facilities, provided that the seating capacity in any stadium does not exceed 24,950 seats. In addition, USC has entered into a Lease Option Agreement with the California Science Center (Sixth District Agricultural Association) that would provide USC with an option to enter into a new lease for the Sports Arena site that could be extended through 2111. USC and LAFC have proposed entering into a sublease for the Sports Arena site that would give LAFC the right to develop the Modified Project and possess and use the Sports Arena site consistent with the rights in these existing USC lease agreements.

As further discussed below, a distinct project site has been identified for the Modified Project's signage program (Signage Project Site), which encompasses an area within the Specific Plan that is slightly larger than the Project Site. Specifically, the Signage Project Site consists of the Project Site in addition to a small area at the southwest corner of Christmas Tree Lane and Figueroa Street, and Parking Lot 6 to the south of the Project Site, which is controlled by the State of California (California Science Center). The only proposed development involved within areas of the Signage Project Site that are outside the Project Site involves signage.

B. Projects Analyzed under the Certified EIR

As previously discussed, the Certified EIR analyzed the demolition of the existing Sports Arena and the redevelopment of the Project Site with two potential options: (1) the Multi-Use Project, which would include a multiple-use space that would serve as a public venue for civic gatherings, celebratory and entertainment events (e.g., festivals, carnivals, rallies, and concerts), and other similar uses, referred to as Option 1 in the Certified EIR; or (2) the Original Stadium Project, which would include an MLS Stadium with a permanent seating capacity of approximately 22,000 seats and associated amenities such as restrooms, concessions, press facilities, spectator viewing areas, luxury suites and club seating, and locker and dressing facilities, referred to as Option 2 in the Certified EIR. Both of these development options were analyzed with an equal level of detail in the Certified EIR, and the Coliseum Commission has kept both options available for future consideration.

The Certified EIR assumed that under the Multi-Use Project (Option 1), all existing improvements on the Project Site, including the Sports Arena and the VIP parking lot, would be removed, and the Project Site would be redeveloped with a multiple-use space anchored by an open-air amphitheater. The multiple-use space would be improved to provide additional surface parking for Coliseum events and would serve as a public venue for civic events such as parades, rallies, public gatherings, festivals, and neighborhood carnivals, similar to the types of outdoor events currently held at the Sports Arena. The bowl-shaped amphitheater would be built into the depression currently occupied by the Sports Arena and would be surrounding by grass-covered seating levels (no fixed seating was proposed). To provide for flexible programming, it was assumed that the multiple-use space could support stand-alone events confined to the Project Site or, alternatively, serve as an extension space and/or overflow parking space for joint events held within Exposition Park, including the Coliseum. A variety of different types of events could be held at the multiple-use space, from outdoor concerts and cultural gatherings with anticipated attendance levels ranging from 500 to 4,000 attendees, to annual events such as charity walks, music festivals, and citywide celebrations with anticipated attendance levels ranging from 1,000 to 90,000 attendees. The Certified EIR assumed that under any possible joint use of the Coliseum and the multiple-use space, the total planned attendance would not exceed the current capacity of the Coliseum (i.e., 93,000 attendees).

The Certified EIR assumed that under the Original Stadium Project (Option 2), the existing Sports Arena would be removed and the Project Site would be redeveloped with an MLS Stadium with a permanent seating capacity of approximately 22,000 seats. The analysis in the Certified EIR assumed that the state-of-the art venue would host 15 MLS games in addition to non-soccer events similar in attendance size to historic operations of the Sports Arena, such as USC soccer games, open-air entertainment events such as

concerts and civic gatherings, and exhibition soccer games, and would serve as a practice facility for local soccer teams. The stadium would also include associated amenities such as restrooms, concessions, press facilities, spectator viewing areas, luxury suites and club seating, and locker and dressing facilities. The VIP parking lot to the west of the proposed stadium was assumed to remain as surface parking. Similar to Option 1, the Certified EIR assumed that total attendance during simultaneous events at the Coliseum and the MLS Stadium would not exceed 93,000 attendees (refer to Mitigation Measure MM J-1 in the Certified EIR).

The Original Stadium Project was assumed to be an outdoor facility oriented on a north-south axis featuring dome-style architecture topped by a curved roof on its east and west sides. The stadium would be constructed within the existing depression currently occupied by the Sports Arena so that the field and much of the seating would be located below grade-level elevation. As a result, the stadium analyzed in the Certified EIR would occupy the same general field of view as the current Sports Arena building. The existing depression would be graded and reconfigured to accommodate the footprint of the stadium, requiring the import of approximately 125,000 cubic yards (cy) of soil.

The lighting for the soccer field would consist of highly focused and directional lighting arrays. Much of the lighting (and all of the high-intensity field lighting) would be directed downward into the bowl-shaped stadium. Low-level security lighting would also be installed throughout the remainder of the Project Site to mark walkways, parking areas, restroom facilities, and entrances. The proposed soccer stadium would also include landscaped plazas and roadways and perimeter landscaping.

The Certified EIR assumed that the Original Stadium Project would include advertising signage and naming rights consistent with similar sporting venues in the Los Angeles area. The Certified EIR explained that while a detailed signage program had not been developed for the Original Stadium Project, the signage program would be in conformance with all applicable requirements of the Los Angeles Municipal Code (LAMC), the design guidelines of the South Los Angeles Community Plan, and the overriding rules and regulations set forth for signage in the Coliseum District Specific Plan.

The construction analysis in the Certified EIR for the Original Stadium Project is based on an approximately 20-month construction schedule that involves the following phases: (1) demolition of the existing Sports Arena, resulting in 5.4 million cubic feet of demolition debris; (2) import of approximately 125,000 cy of soil; (3) grading and reconfiguration of the Project Site to accommodate the stadium footprint; (4) pouring of concrete to create the stadium foundation; (5) construction of the stadium and related support facilities; and (6) installation of grass and landscaping. Construction of the

Approved Multi-Use Project was assumed to entail a similar order of phasing, but with a shorter construction phase and an import of approximately 250,000 cubic yards of soil.

The Coliseum Commission certified the Certified EIR in February 2011. However, the Coliseum Commission did not select between the Original Stadium Project and the Multi-Use Project at that time. Both options remain open.

C. Modified Project

LAFC and USC have proposed entering into a lease agreement for the Sports Arena site that would enable LAFC to develop the Modified Project and possess and use the Sports Arena site consistent with USC's existing agreements with the Coliseum Commission and the California Science Center (Sixth District Agricultural Association). Those existing agreements recognize that the Sports Arena site may be redeveloped with the Original Stadium Project, analyzed as Option 2 in the Certified EIR. As described in detail below, in addition to the Original Stadium Project's approximately 22,000-seat soccer stadium and associated uses, LAFC is proposing certain modifications to the Original Stadium Project that include the addition of up to approximately 105,900 square feet of ancillary amenity floor area (up to approximately 119,000 gross square feet) that would be open during stadium events as well as on non-event days, refinements to the design of the stadium, the redevelopment of the VIP parking lot west of the stadium as a new parking area, and adjustments to construction phasing.[1] These modifications are hereafter referred to as the Modified Project.

A table summarizing the primary differences between the Original Project and the Modified Project is provided in Table 1 on page 11. A Conceptual Site Plan for the Modified Project is provided in Figure 3 page 13.

(1) Ancillary Uses and Northwest Plaza

Under the Modified Project, additional amenities supporting the primary stadium use and further activating the Project Site on non-event days (Ancillary Uses) would be incorporated into the project design to provide for a cohesive development that is comparable to other recently-constructed MLS venues. Specifically, the Ancillary Uses

[1] *The total amount of development would not exceed approximately 641,000 gross square feet.*

Table 1
Comparison Between the Original Stadium Project and the Modified Project

	Original Stadium Project	Modified Project
Demolition	Demolition of the Sports Arena	No Change
MLS Stadium	22,000 seating capacity; Would host MLS games, USC soccer games, open-air entertainment events (e.g., concerts and civic gatherings), and exhibition soccer games. Would include amenities such as restrooms, concessions, press facilities, spectator viewing areas, luxury suites and club seating, and locker and dressing facilities.	No Change
Ancillary Uses		
Conference Facility and Office Space	0	≈ 30,250 sf (max. 21,250 sf office)
Museum	0	≈ 36,000 sf
Team Store and Other Retail	0	≈ 27,750 sf
Restaurant	0	≈ 11,900 sf (max. 4,250 sf high-turnover sit-down) (max. 2,550 sf fast food)
Total Ancillary Uses		≈ 105,900 sf (max)
Open Space and Pedestrian Plazas	Perimeter landscaping and pedestrian plaza areas. Open space square footage not specified.	≈ 143,000 square feet of improved public open space that would consist of pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas, potentially including water features, public art, and seating areas. Pedestrian plazas would include a main plaza at the northwest corner of Project Site and a large pedestrian gathering area along Figueroa Street.
Signage and Lighting	Signage consistent with the LAMC, South Los Angeles Community Plan, and Specific Plan. High-intensity field lighting (focused downward) and low-level security lighting throughout.	New Supplemental Use District (SUD) for signage to permit proposed signage program including up to ≈ 44,500 sf of signage for Modified Project including 19,200 sf digital signage, identification signs, temporary event signs, electronic digital displays, changeable message light-emitting diode (LED) boards, static signs, identification signs and retail/tenant identification signs, with both on-site and off-site signage allowed.

Table 1 (Continued)
Comparison Between the Original Stadium Project and the Modified Project

	Original Stadium Project	Modified Project
		Lighting would include illuminated signage in addition to field and security/wayfinding lighting.
Existing VIP Parking Lot	Retained and used for surface parking	Reconfigured and used for surface parking

sf = square feet

Square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating floor area ratio (FAR). In accordance with LAMC Section 12.03, floor area is defined as: "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."

Source: Eyestone Environmental, 2015.

would include a total of up to approximately 105,900 square feet of new floor area[2] (up to approximately 119,000 gross square feet) and would include the following:

- up to approximately 30,250 square feet (sf) of office and conference facility space, including no more than 21,250 sf of office space (with morning conference facility functions on non-event days limited to 261 attendees and evening conference facility functions on non-event days limited to 430 attendees if the maximum amount of office space is developed);
- an approximately 36,000-sf museum;
- up to approximately 27,750 sf of team store or other retail space (of which no more than 2,700 sf could be located along the Figueroa Street frontage of the Project Site); and up to approximately 11,900 sf of restaurant uses, including no more than 4,250 sf of high-turnover sit-down restaurants and 2,550 sf of fast food restaurants (with no more than 1,275 sf of the fast food space located along the Figueroa Street frontage of the Project Site).

[2] *Except where otherwise noted, square footage is calculated pursuant to the LAMC definition of floor area for the purpose of calculating floor area ratio (FAR). In accordance with LAMC Section 12.03, floor area is defined as: "[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas."*

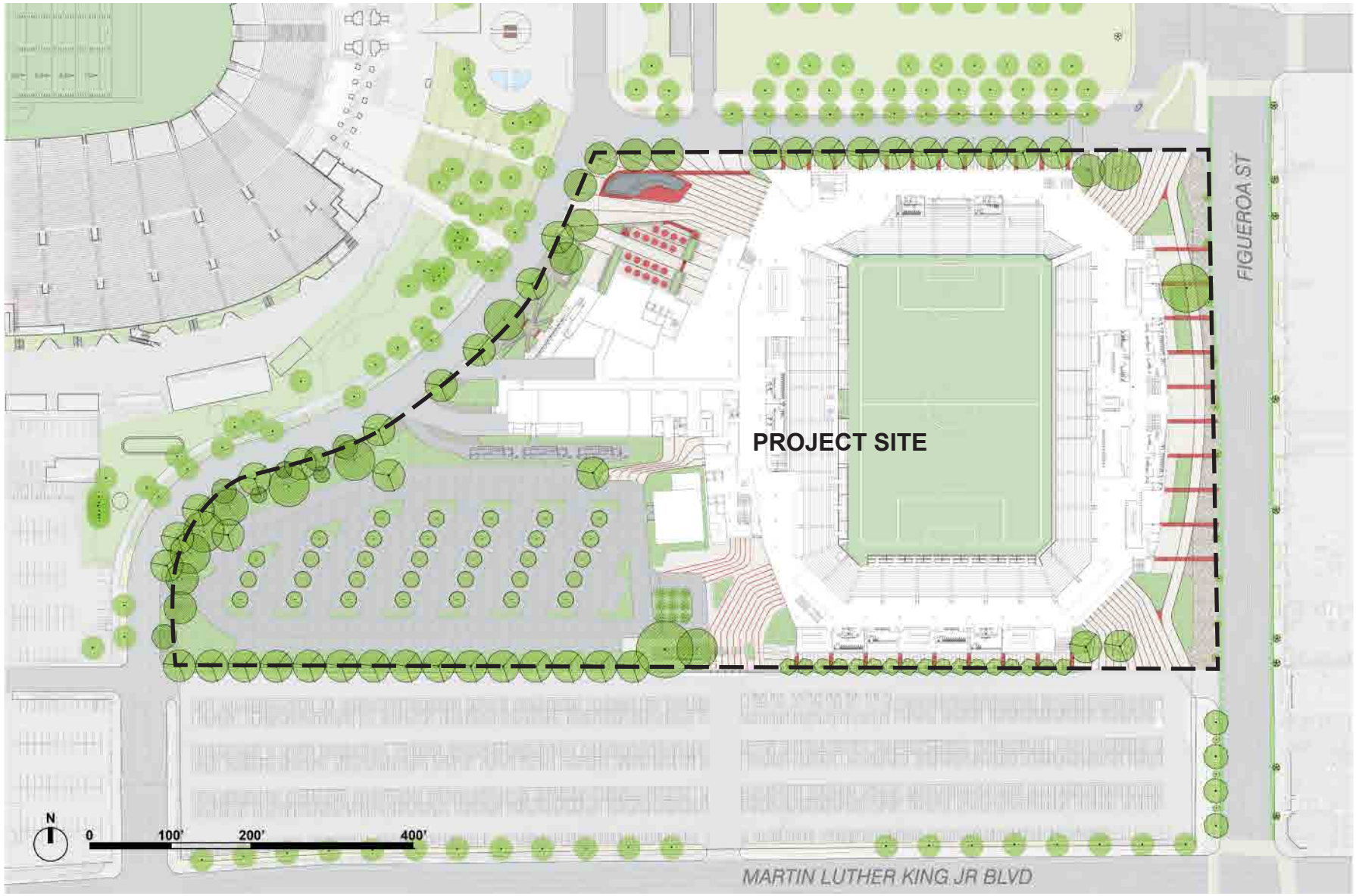

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Figure 3
Conceptual Site Plan

Source: Gensler, 2015.

The primary function of the proposed conference facilities would be to provide programming for event day patrons (e.g., VIP gatherings and other programming during events at the stadium or the adjacent Coliseum). On non-event days, the conference facilities would serve as meeting spaces for conferences for outside organizations (such as USC, chambers of commerce, trade groups, and other types of businesses and organizations), with attendance limited based on the amount of office space that is developed, as described above. Additional conference facility attendees beyond the limits described above could be allowed by reducing the maximum office floor area from the proposed maximum of 21,250 sf. Specifically, for every reduction of 850 sf in office space floor area, the number of persons attending functions in the conference facility could be increased by 5.6 persons for morning conference facility functions on non-event days, and by 3.0 persons for evening conference facility functions on non-event days.

In addition to supporting stadium events (i.e., games and concerts), the Ancillary Uses would be open to the public on non-event days to serve as a catalyst for the revitalization of Exposition Park and to complement and enhance the existing venues and destinations within the park. For periods before, during, and after games/events at the proposed stadium, the Ancillary Uses would be open only to ticket-holding game/event patrons. Further, for events at the adjacent Coliseum reasonably anticipated to equal or exceed 25,000 patrons in attendance, including USC home football games, the Ancillary Uses would be open only to ticket-holding patrons of those events for periods before, during, and after the events. Refer to Project Design Feature O-4 in Section IV.O, Traffic/Transportation/Parking, on page 169 of this Addendum.

Most of the Ancillary Uses would be centered around a main entry plaza at the northwest corner of the Project Site (Northwest Plaza) that would connect to the stadium's main concourse and serve as a primary public entry to the stadium, although up to 3,975 sf of retail and restaurant uses could be located along the stadium's Figueroa Street frontage, as noted above. The Ancillary Uses would reach a maximum height of 75 feet above grade. The Northwest Plaza would provide a gathering space for pre-game events and other game-day activities and would serve as an active public space on non-event days (e.g., for small concerts, red carpet events, and community events such as food festivals or art fairs). Ground floor restaurants would open up to the plaza to provide outdoor dining and seating areas. The Northwest Plaza would be designed to provide a welcoming pedestrian environment with a mix of hardscape and landscaped areas, and could include water features, public art, and seating areas. Sound, lighting, and video components would also be incorporated into the design of the plaza. The Northwest Plaza would link to a system of enhanced pedestrian improvements and open space areas that would encircle the stadium. Specifically, the Modified Project would include approximately 143,000 square feet of improved public open space that would consist of pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas. The Ancillary Uses and the

Northwest Plaza would have the potential to operate from mid-morning (i.e., 10:00 A.M.) until 2:00 A.M., seven days a week, with some ancillary uses (e.g., the museum and retail uses) closing sooner. The conference facilities and office space would have the potential to operate earlier in the morning, as described above, and also would have the potential to operate seven days a week until 2:00 A.M.

(2) Stadium Design

As is the case under the Original Stadium Project, the proposed stadium under the Modified Project would have a maximum seating capacity of approximately 22,000 attendees and would host MLS games, USC field events (such as soccer games), open-air entertainment events such as concerts and civic gatherings, and exhibition soccer games. However, with the evolution of the project design, refinements and modifications have been made to the physical characteristics of the stadium. The following discussion provides a detailed description of the proposed stadium design under the Modified Project. Conceptual renderings of the proposed stadium are provided in Figure 4 through Figure 6 on pages 16 through 18. Stadium elevations are provided in Figure 7 and Figure 8 on pages 19 and 20.

Under the Modified Project, the proposed stadium would be oriented along a north-south axis and, like the Original Stadium Project, would be located within the eastern portion of the Project Site (within a portion of the footprint area currently occupied by the Sports Arena). The footprint of the stadium under the Modified Project would be somewhat larger than under the Original Stadium Project in order to provide for a more modern stadium that includes the amenities expected of a world-class professional sports stadium.

Most of the seating areas within the open-air stadium would be covered by a cantilevered roof canopy extended inward from the stadium's perimeter, with the field level placed approximately 20 feet below street level (as measured from the grade along Figueroa Street), roughly at the same elevation as the floor of the existing Sports Arena. The roof canopy would consist of a steel frame with a lightweight, ethylene tetrafluoroethylene (ETFE) canopy skin that would provide shade for most of the stadium's seating areas while also being translucent. The canopy skin would moderate the perceived height of the stadium because it would be permeable to light and would not be perceived as solid. The top of the roof canopy of the stadium would reach a maximum height of approximately 105 feet above street level, with rooftop structures extending to approximately 115 feet.

Based on the conceptual site plan, the stadium structure would be approximately 470 feet from the Coliseum peristyle when measured on the diagonal from the northwestern corner of the stadium. The westernmost façade of the Ancillary Uses building

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Figure 4
Conceptual Stadium Rendering—Figueroa Street Entry

Source: Gensler, 2015.

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Figure 5
Conceptual Stadium Rendering—Northwest Plaza

Source: Gensler, 2015.

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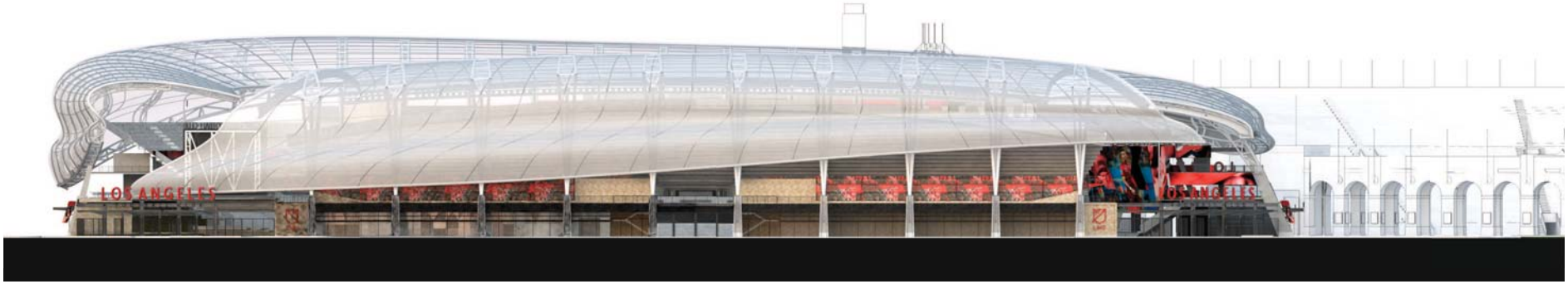
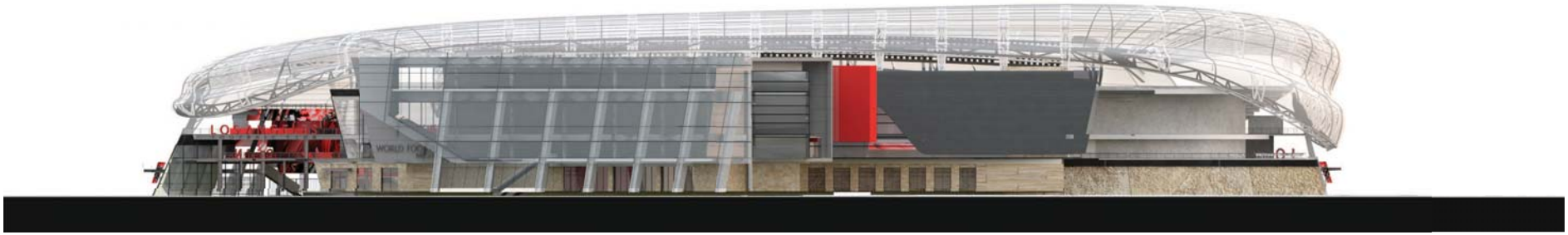
Figure 6
Conceptual Stadium Rendering—Aerial View

Source: Gensler, 2015.



EAST ELEVATION



WEST ELEVATION

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Figure 7
Proposed Stadium Elevations—East and West

Source: Gensler, 2015.

NORTH ELEVATION

SOUTH ELEVATION

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Figure 8
Proposed Stadium Elevations—North and South

Source: Gensler, 2015.

would be setback approximately 60 feet from South Coliseum Drive and approximately 270 feet from the Coliseum wall. The eastern façade of the stadium would be setback approximately 58 feet from Figueroa Street. The northern façade of the stadium structure would be setback 27 feet from the southern curb of South Coliseum Drive. Through the final design process, the stadium footprint could be moved or extended up to 40 feet to the west from the location depicted on the conceptual site plan shown in Figure 3 on page 13. Under this scenario, no building heights would increase, and the Ancillary Uses building would remain in the same location, though would be reconfigured in the area where it connects to the stadium. If adjusted in this manner, the stadium structure would be approximately 430 feet from the Coliseum peristyle. Under any buildout scenario, the Modified Project would retain the geometry of the existing sidewalk and curb line of South Coliseum Drive.

The stadium's seating bowl would be comprised of multiple levels that would provide a series of different seating types and amenities including a supporter's section, standing room terraces, premium clubs and suites, and general seating areas. The main concourse of the stadium would be located at street level and would provide an open-air, 360-degree circulation path around the stadium, connecting to several general and premium entry points distributed along the stadium perimeter. Premium spaces such as club lounges and suites would be interior spaces. A rooftop terrace at the top of the west seating bowl, along with two standing room terraces along the northern side of the stadium, would be featured spaces both during games and for other hospitality events, with potential hours of operation from mid-morning until 2:00 A.M., seven days a week. The rooftop terraces could include features such as seating areas, gathering spaces, water features (such as a reflection pool or pool), and art.

The stadium's northeast and southeast corners would be open to provide views into and out of the stadium seating bowl. Specifically, these openings would allow for clear views into the stadium from the street and sidewalk along Figueroa Street at the primary entry to Exposition Park, and would frame focal views of the downtown skyline from within the seating bowl, particularly from the southwest corner. The base of the stadium at street level would draw on material influences from the Coliseum and Swim Complex, incorporating similar materials and color palates, such as the Travertine and the concrete used extensively on those venues. Entry gates would be clearly identifiable and would prominently feature signage integrated into their design. As such, the design of the street level façades would relate to a human scale.

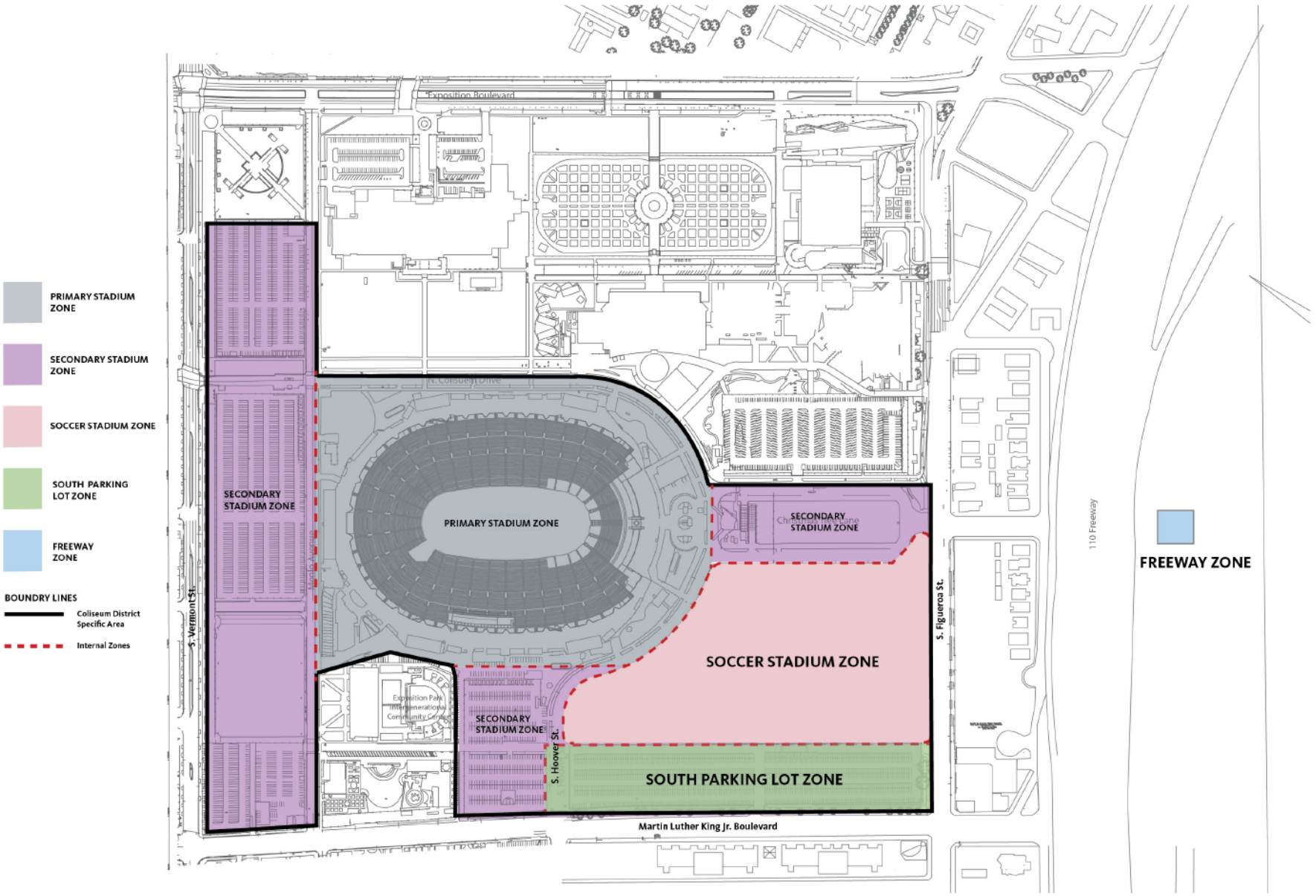
(3) Signage and Lighting

A signage program has been developed for the Modified Project that is an important element of a major league sports stadium. The proposed signage program would support

advertising and the naming and sponsorship rights to the Modified Project, generating revenue streams necessary for Modified Project funding. Signage rules and regulations pertaining to the Project Site are currently set forth in the Specific Plan. The Modified Project's signage program would be implemented through a new Supplemental Use Sign District (SUD), consistent with current City policies regarding the regulation of signage. Consistent with the Specific Plan, the proposed SUD would encompass the Project Site as well as all of the Specific Plan area. As part of the Modified Project's proposed Specific Plan amendment (refer to Section III.9, Discretionary Actions, on page 30 of this Addendum), the existing signage authorized in the Specific Plan, which includes some signage for the Project Site, the Coliseum, and surrounding areas, would be removed from the Specific Plan and relocated into the proposed SUD, along with modifications to permit the Modified Project's signage program. Signage rights previously allowed by the Specific Plan for the Coliseum and other areas in the Specific Plan area that are unrelated to the Modified Project's signage program would not change under the proposed SUD.

As shown on Figure 9 on page 23, the proposed SUD would encompass the entire Specific Plan area and would create five sign zones, the Primary Stadium Zone, Secondary Stadium Zone, Soccer Stadium Zone, South Parking Lot Zone, and Freeway Zone. The Project Site is located within the Soccer Stadium Zone. The proposed SUD would allow the same amount and variety of signage currently authorized by the Specific Plan in the Primary Stadium Zone, Secondary Stadium Zone, and Freeway Zone. A new signage program associated with the Modified Project would be allowed in the Soccer Stadium Zone. In addition, some limited new signage associated with the Modified Project would be allowed in the South Parking Lot Zone (i.e., Parking Lot 6 south of the Project Site). The areas where Modified Project-related signage would be permitted are collectively referred to as the Signage Project Site, as shown in Figure 10 on page 24. The Signage Project Site consists of the Project Site in addition to a small area at the southwest corner of Christmas Tree Lane and Figueroa Street (located in the SUD's proposed Soccer Stadium Zone), and Parking Lot 6 to the south of the Project Site (located in the SUD's proposed South Parking Lot Zone). The proposed signage program for the Signage Project Site, including permitted sign types, sizes, and locations, is provided in Appendix C of this Addendum.

As shown in Appendix C of this Addendum, total signage allowed in the Signage Project Site as part of the SUD for the Modified Project, excluding aerial view signs, information signs, temporary signs, and interior signs, would be approximately 44,500 square feet, including up to approximately 19,200 square feet of digital signage. Individual signs could vary from approximately 40 to 3,800 square feet in size, depending on the sign zone, sign type, and location. Permitted signage would include a freestanding digital sponsorship sign along Figueroa Street in the South Parking Lot Zone, a free-standing digital sign near the southeast corner of the Soccer Stadium Zone along Figueroa Street, a



eyestone ENVIRONMENTAL

Figure 9
Proposed Supplemental Use Sign District

Source: Gensler, 2015.

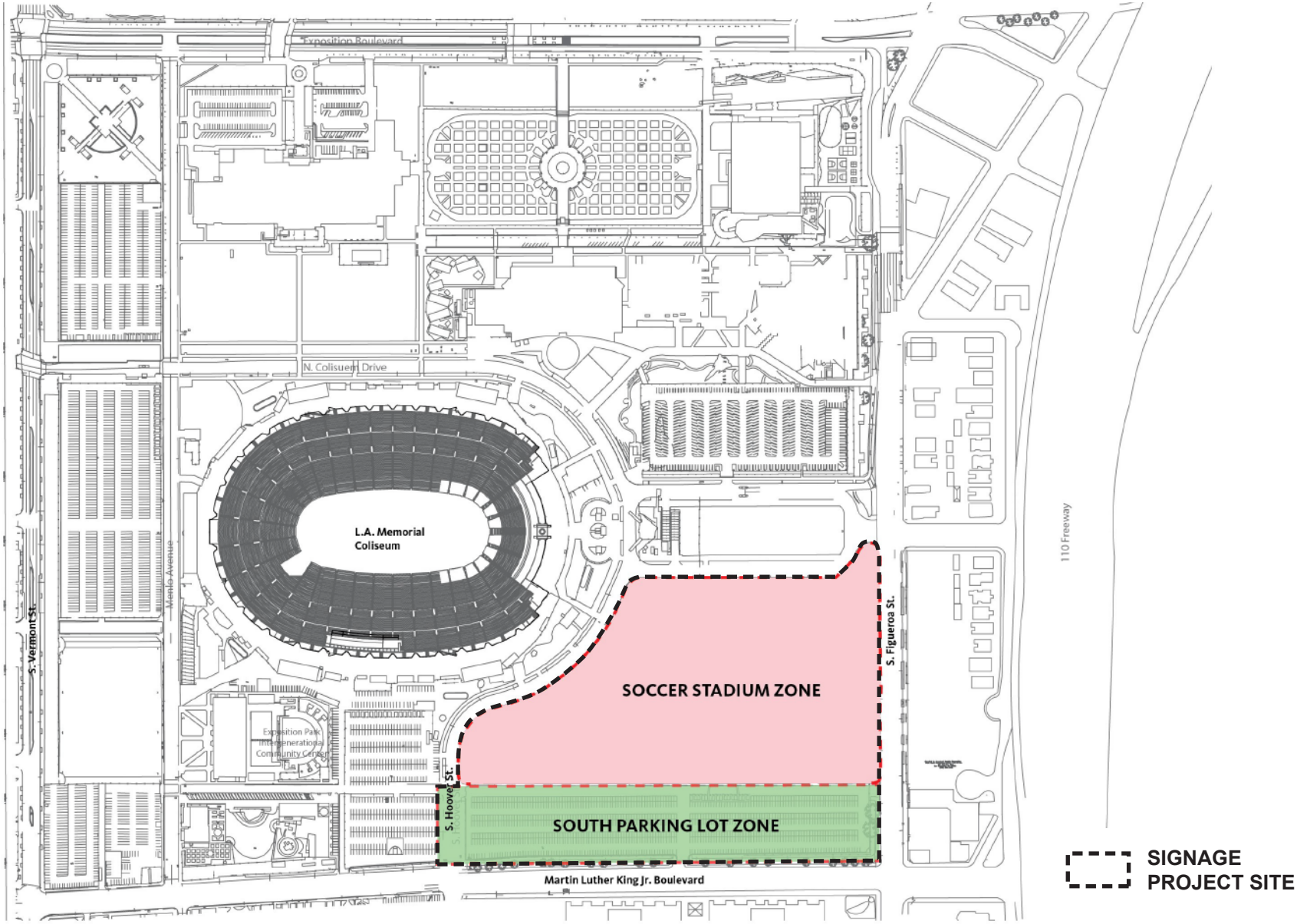


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Figure 10
Signage Project Site

Source: Gensler, 2015.

free-standing digital sign near the entry to Exposition Park at Christmas Tree Lane at the northeastern corner of the Soccer Stadium Zone adjacent to Figueroa Street, and digital signs integrated with the architecture of the stadium. In addition, smaller-scale, directional pedestrian and vehicular signage would be placed throughout the Signage Project Site as necessary to facilitate access and safety. The types and extent of permitted signage would emphasize the event and entertainment-oriented aspect of the Project Site. Specifically, signage types could include identification signs, temporary event signs, electronic digital displays, changeable message light-emitting diode (LED) boards, static signs, identification signs and retail/tenant identification signs, with both on-site and off-site signage allowed. In addition, the SUD would place limitations on the operating hours and illumination of permitted signs.

Lighting for the Modified Project would include lighting of the stadium, including the field and associated amenities and ancillary uses (e.g., outdoor dining and seating areas, plazas, and walkways). Lighting emissions resulting from the illuminated signage are expected to be emitted from three types of signs: front-lit signs, electronic digital displays, and changeable message LED boards.

(4) VIP Parking Lot

Under the Modified Project, the VIP parking lot west of the stadium, which contains approximately 238 vehicle parking spaces, would be reconfigured and re-landscaped to provide a secure, VIP parking lot with up to approximately 250 parking spaces. The parking lot would be surrounded by a perimeter fence and gates and accessed from South Coliseum Drive, similar to existing conditions.

(5) Figueroa Street Pedestrian Improvements and Project Site Boundary Modification

The Modified Project would provide a 40- to 70-foot setback along Figueroa Street to activate the pedestrian realm. This area would be developed as a broad, landscaped sidewalk to provide sufficient space for patrons to circulate and queue on event days, and to provide an inviting and safe pedestrian environment on non-event days. The portion of the sidewalk that would be redeveloped would include the on-site portion along the eastern boundary of the Project Site as well as two off-site portions north and south of the Project Site such that the improved sidewalk would extend from Christmas Tree Lane to Martin Luther King, Jr. Boulevard. Additionally, up to 3,975 sf of retail and restaurant use floor area could be located along the stadium's Figueroa Street frontage, as noted above. The Modified Project also includes a slight modification to the Project Site boundary at the northeast corner of the Project Site so that the Project Site boundary generally corresponds with the southern and western edges of the South Coliseum Drive and Figueroa Street

rights-of-way, respectively, as shown in Figure 1, Figure 2, and Figure 3 on pages 5. 6, and 13, respectively. With this change, the size of the Project Site remains approximately 15 acres, which is substantially consistent with the Project Site analyzed in the Certified EIR.

(6) Sustainability Features

The Modified Project would incorporate sustainability as part of its key design and operation criteria. In so doing, the Modified Project would comply with Title 24 of the California Code of Regulations, including Part 6 (Energy Efficiency Standards for Residential and Nonresidential Buildings) and Part 11 (California Green Building Standards Code, commonly referred to as the CALGreen Code), as well as the City of Los Angeles Green Building Code (2013), which incorporates the CALGreen Code into Chapter IX of the LAMC, in effect at the time of the Modified Project's permit application. The Modified Project would also be designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-BD+C or LEED-ND Rating System (v.3), or equivalent green building standards. Specific sustainability features that have been incorporated into the Modified Project are summarized below. It should be noted that while this Addendum evaluates the potential environmental impacts that would occur from the proposed modifications to the Original Stadium Project, i.e., the Ancillary Uses that would be developed under the Modified Project, in order to present a comprehensive and informative description of the degree of sustainability for the development as a whole, the proposed sustainability features would apply to all development located within the Project Site, including the stadium component of the Modified Project.

Site Location and Community Access

- The Project Site is located approximately two miles southwest of downtown, within Exposition Park, on a previously developed urban site where substantial existing infrastructure is in place (refer to Figure 1 on page 5). This location provides convenient pedestrian access to several stops on the Expo Light Rail Line, including the Expo Park/USC Station (0.35 mile from the Project Site) and the Expo/Vermont Station (0.7 mile from the Project Site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the Project Site). All of these transit facilities are operated by the Los Angeles County Metropolitan Transportation Authority (Metro). The Project Site is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Project Site.

Water Efficiency

- The Modified Project would reduce indoor potable water demand by at least 20 percent below 2013 CALGreen requirements.

- The Modified Project would comply with City Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

- The Modified Project would include conservation measures in accordance with Los Angeles Department of Water and Power (LADWP) requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping).

- The Modified Project would use native, drought-tolerant plantings and xeriscape designs for non-playing field areas.

Water Quality

- The Applicant would prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) and Standard Urban Stormwater Mitigation Plan (SUSMP), both of which would include Best Management Practices (BMPs), subject to City of Los Angeles Department of Building and Safety approval. The Modified Project would comply with applicable Los Angeles County Regional Water Quality Control Board (LARWQCB) requirements including National Pollutant Discharge Elimination System (NPDES) and Municipal Separate Storm Sewer System (MS4) requirements.

Energy and Atmosphere

- The Modified Project would comply with the required measures of the 2013 Los Angeles Green Building Code and would implement additional efficiency measures to achieve a reduction in energy consumption that is greater than 25 percent relative to the ASHRAE 90.1-2007 standard, but no less than minimum compliance with the 2013 California energy efficiency standards (Title 24, Part 6). Energy efficiency would be achieved through building design and through the incorporation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems, lighting, and appliances.

- Ten percent of the parking spaces provided in the Modified Project's VIP parking lot on the Project Site shall be constructed to accommodate the future placement of facilities for the recharging of electric vehicles.

Materials and Resources

- A minimum of 20 percent of all building materials would consist of pre-consumer and post-consumer recycled content and would be manufactured within a 500-mile radius of the Project Site.

- The Applicant would develop a construction and demolition debris recycling program to divert construction related solid waste and demolition debris from area landfills. Specifically, a minimum of 75 percent of all demolition and construction waste would be diverted for recycling.

- During operation, the Modified Project would divert solid waste from landfills through robust recycling, the donation of durable goods, and implementing a front-of-house composting program that includes sourcing biodegradable concessions packaging.

Indoor and Outdoor Air Quality

- An indoor air quality management plan would be prepared prior to construction. The design would specify interior finish materials such as adhesives, sealants, paints, flooring, and composite wood products with low emission rates of volatile organic compounds (VOCs) to reduce the generation of indoor air contaminants that are odorous, irritating and/or harmful to the comfort and well-being of the construction work force and building occupants.

- The Applicant would implement South Coast Air Quality Management District (SCAQMD)-recommended BMPs during construction and would comply with SCAQMD Rule 403—Fugitive Dust.

- The Applicant would use low-VOC paints for all interior and exterior surfaces.

(7) Site Access and Parking

Parking for the Modified Project would be provided by the supply available at Exposition Park. Exposition Park provides approximately 5,961 parking spaces in multiple parking lots and on streets within Exposition Park (not including the on-site VIP parking lot, as discussed below). These spaces are used by the Coliseum, the Sports Arena, the California Science Center, the Los Angeles County Natural History Museum, the California African American Museum, and other park visitors. Per the terms of a Non-Disturbance Agreement between the California Science Center and USC, during special events at the

Coliseum or Sports Arena (i.e., events with a reasonably anticipated or actual attendance of 3,000 people or more), 600 parking spaces may be reserved by the California Science Center in the Science Center parking structure and 375 spaces may be reserved by the Natural History Museum in Lot 3. If these reservations occur, an estimated 4,986 spaces would be available for events in the Exposition Park parking supply. The Modified Project would not alter these parking space allocations in the Non-Disturbance Agreement between the California Science Center and USC.

It should also be noted that the existing VIP parking lot located on the Project Site, which contains approximately 238 vehicle parking spaces, is not included in the approximately 5,961-space parking supply in Exposition Park. Under the Modified Project, this parking lot would be retained and reconfigured to provide up to approximately 250 spaces. This would increase the vehicle parking supply in Exposition Park to up to approximately 6,211 spaces (5,236 on special event days if the Science Center and Natural History Museum reservations occur).

Vehicle access to the Project Site would be provided off of Figueroa Street via Exposition Park Drive (Christmas Tree Lane) and Martin Luther King, Jr. Boulevard. Primary vehicle access on non-event days would occur at the existing signalized intersections of Hoover Street/Martin Luther King, Jr. Boulevard and Figueroa Street/ Exposition Park Drive/39th Street. Truck access to the Project loading docks would be provided from South Coliseum Drive (Hoover Street). Additionally, the south drive of Christmas Tree Lane could be closed to traffic and open to pedestrians prior to and during events at the stadium, and would be re-opened to allow for exiting traffic prior to completion of the event.

The Modified Project would provide a minimum of 440 bicycle parking spaces (two percent of the proposed stadium seating capacity) to encourage bicycling to events at the stadium, of which 107 (58 short-term and 49 long-term) would be provided in LAMC-compliant bike racks and would satisfy LAMC bicycle parking requirements for the Modified Project's Ancillary Uses on non-event days. The remaining 333 bicycle parking spaces would be managed via a bicycle valet service on event days.

(8) Construction

Construction of the Modified Project is anticipated to take approximately 20.5 months to complete, which is slightly longer than the construction duration assumed for the Original Stadium Project in the Certified EIR. Construction is anticipated to involve five key phases: abatement and soft demolition (approximately 10 weeks); structure demolition (approximately 14 weeks); grading (approximately 4 weeks); building construction (approximately 14 months); and site finishing (approximately 2 months,

overlapping with the last several weeks of building construction). It is estimated that demolition of the existing Sports Arena would create approximately 5.4 million cubic feet of debris, a large percentage of which would be reused on-site as base material. Up to 200,000 cubic yards (cy) of soil would be moved and re-compacted on-site. Whereas the Original Stadium Project analyzed in the Certified EIR estimated an import of approximately 125,000 cy of soil, the Modified Project could result in a total import/export of up to 30,000 cy of soil. Construction trucks and workers would access the Project Site via Martin Luther King, Jr. Boulevard, and construction worker parking would be coordinated through the Exposition Park General Manager.

(9) Discretionary Actions

The Lead Agency with discretionary authority to approve the Modified Project is the Coliseum Commission. In addition, the Modified Project would require various discretionary and ministerial approvals from the City of Los Angeles. In addition to approval of the Modified Project by the Coliseum Commission, approvals required for development of the Modified Project by the City of Los Angeles would include, but may not be limited to, the following:

- Amendment of the Coliseum District Specific Plan to expressly allow development standards for Modified Project (e.g., seating capacity, floor area ratio (FAR), height, signage, parking and uses);
- Director's Review (pursuant to Coliseum District Specific Plan);
- Alcohol Use Approval to expressly allow all establishments that would sell and serve alcohol (pursuant to Coliseum District Specific Plan);
- Sign District/Supplemental Use District (Zone Change) for Signage; and
- Possible Board of Police Commissioners permit for extended interior construction hours.

Other discretionary approvals for the Modified Project may include:

- Haul Route approval (as applicable);
- Possible approval of a property and/or project agreement by the Coliseum Commission authorizing the development of the Modified Project on the Project Site; and
- Possible approval of a Non-Disturbance Agreement or other agreements for LAFC's operation of the Modified Project by the State of California (California

Science Center—Sixth District Agricultural Association), including use of State-owned properties in Exposition Park for signage, parking, and construction staging.

IV. Comparative Analysis of Modified Project Impacts

The analyses provided below address each of the environmental issues analyzed in the Certified EIR and focus on the potential changes in environmental impacts that could result from implementation of the Modified Project. Specifically, potential impacts attributable to the Modified Project are compared with the analysis and findings within the Certified EIR to determine if such impacts are within the envelope of impacts documented in the Certified EIR, including whether new significant impacts would result from the Modified Project or whether previously identified significant impacts would be substantially more severe. As set forth by the analyses below, and as summarized in Table 2 on page 32, the Modified Project would not result in any new significant environmental impacts or a substantial increase in the severity of a significant impact already identified in the Certified EIR. In addition, a revised Mitigation Monitoring Program (MMP) containing all Project Design Features and Mitigation Measures applicable to the Modified Project, including applicable mitigation measures from the Certified EIR analysis, is included as Appendix A to this Addendum.

Table 2
Comparison of Impacts Under the Original Stadium Project and the Modified Project

	Original Stadium Project Impact	Modified Project Impact
A. Aesthetics/Visual Resources		
Visual Character/Views		
Construction	Not Analyzed	Less Than Significant
Operation	Less Than Significant	Less Than Significant
Light, Glare, and Shading		
Light and Glare	Less Than Significant with Mitigation	Less Than Significant with Mitigation
Shading	Not Analyzed	Less Than Significant
B. Agriculture and Forestry Resources		
Agricultural Resources	No Impact	No Impact
Forestry Resources	Not Analyzed	No Impact
C. Air Quality		
Construction		
Regional Emissions	Significant and Unavoidable	Significant and Unavoidable
Local Emissions	Less Than Significant	Less Than Significant
Operation		
Regional Emissions	Less Than Significant	Less Than Significant
Local Emissions	Not Analyzed	Less Than Significant
D. Biological Resources		
Biological Resources	No Impact	Less Than Significant
E. Cultural Resources		
Archaeological Resources	Not Analyzed	Less Than Significant
Paleontological Resources	Not Analyzed	Less Than Significant with Mitigation
Historic Resource	Significant and Unavoidable	Significant and Unavoidable
F. Geology and Soils		
Geology and Soils	Not Analyzed	Less Than Significant
G. Greenhouse Gas Emissions		
Greenhouse Gas Emissions	Less Than Significant	Less Than Significant
H. Hazards and Hazardous Materials		
Hazards and Hazardous Materials	Less Than Significant	Less Than Significant with Mitigation
I. Hydrology and Water Quality		
Hydrology and Water Quality	Less Than Significant	Less Than Significant

Table 2 (Continued)
Comparison of Impacts Under the Original Stadium Project and the Modified Project

	Original Stadium Project Impact	Modified Project Impact
J. Land Use and Planning		
Consistency with Regulatory Framework	Less Than Significant	Less Than Significant
Land Use Compatibility—Construction	Significant and Unavoidable	Significant and Unavoidable
Land Use Compatibility—Operation	Less Than Significant	Less Than Significant
K. Mineral Resources		
Mineral Resources	No Impact	No Impact
L. Noise		
Construction	Significant and Unavoidable	Significant and Unavoidable
Operation	Significant and Unavoidable	Significant and Unavoidable
M. Population, Housing, and Employment		
Population	Less Than Significant	Less Than Significant
Housing	Less Than Significant	Less Than Significant
Employment	Less Than Significant	Less Than Significant
N. Public Services		
Fire Protection	Less Than Significant with Mitigation	Less Than Significant with Mitigation
Police Protection	Less Than Significant with Mitigation	Less Than Significant with Mitigation
Schools	Not Analyzed	Less Than Significant
Parks and Recreation	Not Analyzed	Less Than Significant
Other Public Facilities (Libraries)	Not Analyzed	Less Than Significant
O. Traffic and Circulation		
Construction		
Traffic	Not Analyzed	Less Than Significant
Operation		
Intersections	Less Than Significant	Less Than Significant
Congestion Management Program	Not Analyzed	Less Than Significant
Access	Not Analyzed	Less Than Significant
Parking	Less Than Significant	Less Than Significant
P. Utilities and Service Systems		
Water Supply	Less Than Significant	Less Than Significant
Wastewater	Less Than Significant	Less Than Significant
Solid Waste	Less Than Significant	Less Than Significant
Energy	Less Than Significant	Less Than Significant

Source: Eyestone Environmental, 2015.

A. Aesthetics

The following analysis of the Modified Project's potential impacts associated with aesthetics (visual character and views, light and glare and shading) is based on the analysis provided in Section IV.A, Aesthetics, of the Certified EIR, and on the Environmental Impact Lighting Study (Lighting Study) prepared for the Modified Project by Francis Krahe & Associates, dated August, 2015, which is included in Appendix B of this Addendum. The Lighting Study evaluates the proposed lighting program associated with the Modified Project and determines whether the Modified Project would result in new significant light and glare impacts not previously identified in the Certified EIR.

(a) Visual Character and Views

(i) Construction

Construction-related visual character and views impacts were not assessed in detail in the Certified EIR. As set forth in the L.A. CEQA Thresholds Guide and within the Certified EIR, visual character and views impacts are based on a number of factors that are used to determine whether a Project would substantially alter, degrade, or eliminate the existing visual character of an area. As set forth on pages IV.A-21–IV.A-22 of the Certified EIR, these factors include the existing valued aesthetic features that would be removed; open space to be developed; integration of new structures with open spaces; contrast of project features with the area's aesthetic image; the potential for new structures to detract from the existing image of the area; the Project's contribution to the area's aesthetic value; and consistency of the Project with applicable design guidelines and/or regulations.

Similar to the Original Stadium Project, during construction activities for the Modified Project, the visual appearance of portions of the Project Site would be altered due to the removal of the existing Sports Arena building and redevelopment of the Project Site with a new stadium building, and the Modified Project's proposed Ancillary Uses and outdoor open space areas. Related construction activities including site preparation and grading and the staging of construction equipment and materials (i.e., bulldozers, portable toilets, and offices) would also alter the visual character of the Project Site. However, in accordance with Project Design Feature A-1, the perimeter of the Project Site would be screened, which would limit views of construction activities from off-site areas. Given the temporary nature of construction activities and the use of screening to limit views of construction activities, short-term construction activities would not substantially and adversely alter or degrade the existing visual character of the Project Site. As such, construction of the Modified Project would not result in any new significant impacts with respect to construction-related visual character and view impacts. Construction-related impacts to views and visual character would be less than significant, and no mitigation measures are required.

(ii) Operation

The Certified EIR for the Original Stadium Project concluded that impacts with respect to visual character and views during operation of the Original Stadium Project would be less than significant (refer to Section IV.A, Aesthetics, of the Certified EIR). As set forth above, the thresholds on which this analysis was based are stated on pages IV.A-21–IV.A-22 of the Certified EIR. As discussed in the Certified EIR, the Original Stadium Project would result in a notable change to the existing character of the Project Site, as the Sports Arena building would be demolished and replaced with a modern, open-roof stadium complex. The new soccer stadium proposed under the Original Stadium Project, while architecturally different than the existing Sports Arena, would have occupied approximately the same general height, mass, and orientation as the Sports Arena. In addition, architecturally, the Certified EIR stated that the Original Stadium Project would be designed to complement the existing public use structures within Exposition Park and would generally improve the visual character in the project area. Perimeter landscaping and pedestrian plaza areas of the Original Stadium Project would be improved around the stadium fronting Figueroa Street. In addition, the Certified EIR determined that views from residential and commercial uses in the outlying vicinity would not be adversely affected since the Original Stadium Project would occupy the same general field of view as the existing Sports Arena building. With regard to signage, the Certified EIR concluded that while a detailed signage program was not developed at the time of preparation of the EIR, signage would be implemented in accordance with all of the applicable codes of the LAMC, the design guidelines of the South Los Angeles Community Plan, as it pertains to signage, and the rules and regulations set forth in the Specific Plan. Accordingly, the Certified EIR determined that under the Original Stadium Project, visual character and view impacts, including impacts related to the addition of signage to the Project Site, would be less than significant.

As described in detail in Section III, Project Description of this Addendum, the physical development envelope under the Modified Project would not vary substantially from the Original Stadium Project. Specifically, as with the Original Stadium Project, the Modified Project includes an approximately 22,000-seat soccer stadium and associated uses, which would replace the existing Sports Arena within Exposition Park. Proposed modifications to the Original Stadium Project include the addition of up to approximately 105,900 square feet of ancillary amenity floor area (Ancillary Uses), and refinements to the design of the stadium and open space areas. Most of the Ancillary Uses would be centered around a main entry plaza at the northwest corner of the Project Site (Northwest Plaza) that would connect to the stadium's main concourse and serve as a primary public entry to the stadium. The Northwest Plaza is designed to serve as an active public space that would be integrated with ground-floor restaurants with outdoor dining areas. The Ancillary Uses would be a maximum of 75 feet above grade. The Modified Project would also include a 40- to 70-foot setback along Figueroa Street to activate the pedestrian

realm. Overall, as compared the Original Stadium Project, the Modified Project would provide enhanced pedestrian improvements and open space areas, including approximately 143,000 square feet of improved public open space around the Project Site that would include pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas and could potentially include water features, public art, and seating areas.

Under the Modified Project, the proposed stadium would be oriented along a north-south axis and, like the Original Stadium Project, would be located within the eastern portion of the Project Site (within a portion of the footprint area currently occupied by the Sports Arena). The footprint of the stadium under the Modified Project would be somewhat larger than under the Original Stadium Project in order to provide for a more modern stadium that includes the amenities expected of a world-class professional sports stadium. Most of the seating areas within the open-air stadium would be covered by a cantilevered roof canopy extended inward from the stadium's perimeter, with the field level placed approximately 20 feet below street level (as measured from the grade along Figueroa Street), roughly at the same elevation as the floor of the existing Sports Arena, consistent with the Original Stadium Project. The top of the roof canopy of the stadium would reach a maximum height of approximately 105 feet above street level, with rooftop structures extending to approximately 115 feet. The roof canopy skin would consist of a translucent, ETFE material, which would moderate the perceived height of the stadium because it would be permeable to light and would not be perceived as solid. The main concourse of the stadium would be located at street level and would provide an open-air, 360-degree circulation path around the stadium, connecting to several general and premium entry points distributed along the stadium perimeter. In addition, the stadium's northeast and southeast corners would be open to provide views into and out of the stadium seating bowl. Specifically, these openings would allow for clear views into the stadium from the street and sidewalk along Figueroa Street at the primary entrance to Exposition Park, and would frame focal views of the downtown skyline from within the seating bowl, particularly from the southwest corner. The base of the stadium at street level would draw on material influences from the Coliseum and Swim Complex, incorporating similar materials and color palates such as the Travertine and the concrete used extensively on those venues. Entry gates would be clearly identifiable and would prominently feature signage integrated into their design. As such, the design of the street level façades would relate to a human scale.

As discussed in detail in Section III, Project Description, on page 4 of this Addendum, the proposed Supplemental Use Sign District (SUD) for the Modified Project would authorize a new signage program in the proposed Signage Project Site, which consists of the Project Site in addition to a small area at the southwest corner of Christmas Tree Lane and Figueroa Street (located in the SUD's proposed Soccer Stadium Zone), and Parking Lot 6 to the south of the Project Site (located in the SUD's proposed South Parking

Lot Zone). Total signage allowed in the Signage Project Site as part of the SUD for the Modified Project, excluding aerial view signs, information signs, temporary signs, and interior signs, would be approximately 44,500 square feet, including up to approximately 19,200 square feet of digital signage. Individual signs could vary from approximately 40 to 3,800 square feet in size, depending on the sign zone, sign type, and location. Permitted signage would include a freestanding digital sponsorship sign along Figueroa Street in the South Parking Lot Zone, a free-standing digital sign near the southeast corner of the Soccer Stadium Zone along Figueroa Street, a free-standing digital sign near the entry to Exposition Park at Christmas Tree Lane at the northeastern corner of the Soccer Stadium Zone adjacent to Figueroa Street, and digital signs integrated with the architecture of the stadium. In addition, smaller-scale, directional pedestrian and vehicular signage would be placed throughout the Signage Project Site as necessary to facilitate access and safety. The types and extent of permitted signage would emphasize the event and entertainment-oriented aspect of the Project Site. Specifically, signage types could include identification signs, temporary event signs, electronic digital displays, changeable message LED boards, static signs, identification signs and retail/tenant identification signs, with both on-site and off-site signage allowed.

Based on the physical description of the Modified Project summarized above and the more detailed description provided in Section III, Project Description, of this Addendum, potential visual character and views impacts, including impacts related to signage, would continue to be less than significant under the Modified Project. The Project Site is located within an urbanized area and specifically within the 145-acre Exposition Park, a major community resource and destination within the City that includes the Coliseum, several museums, educational facilities, recreational amenities and open space areas, including existing signage and approved additional signage pursuant to the Coliseum District Specific Plan. Exposition Park, including the Sports Arena and the Coliseum, has been a renowned destination for major sporting and entertainment activities for decades. The Modified Project would therefore continue the primary existing use on the Project Site by providing an iconic sports and entertainment destination. Further, the Modified Project would replace an aging, underutilized indoor stadium with a new, open-air stadium characterized by contemporary, streamlined architecture. As shown in the visual renderings provided in Figure 4 through Figure 6 on pages 16 through 18 of this Addendum, the stadium would be designed to create an iconic venue for LAFC and the City of Los Angeles, and would consist of materials and color palates that draw influence from adjacent structures within Exposition Park, including the Coliseum. While the height and massing of the new structures would be taller than the existing Sports Arena, the proposed height of the new structures would be modulated with building heights that would range from approximately 75 feet above grade (for the Ancillary Uses in the Northwest Plaza, closest to the Coliseum) to approximately 105 feet above grade (for the proposed stadium roof structure located within the southeast portion of the site furthest from the Coliseum). The proposed building heights would be visually compatible with and within the context of the adjacent

Coliseum, which reaches a height of approximately 75 feet above grade at the Coliseum Bowl and a height of 124 at the top of the peristyle.[3] The Modified Project was specifically designed to respect the height of the Coliseum, so that its maximum height occurs at the edge furthest from the Coliseum (southeast corner), transitioning down to its lowest height of approximately 75 feet at the edge closest to the Coliseum. As discussed in detail in Section IV.E, Cultural Resources, on page 61 of this Addendum, the Coliseum's historic significance would not be materially impaired by the physical design of the Modified Project, and the change in setting under the Modified Project would result in a less than significant impact to the historic significance of the Coliseum.

In addition, the openings within the façade of the Modified Project's stadium and its translucent roof canopy would create additional architectural articulation and view opportunities (as discussed below), thereby contributing to the area's aesthetic value. Furthermore, as summarized above, the new structures would be integrated with approximately 143,000 square feet of improved public open space around the Project Site, which would include a new Northwest Plaza that would also be integrated with the Coliseum and adjacent areas within Exposition Park, as well as an expansive setback along Figueroa Street that would include enhanced landscape and streetscape to activate the western portion of the Project Site and create an inviting pedestrian space. Further, under the Modified Project, the street pattern, sidewalks, rows of trees, and central green space of North and South Coliseum Drives and Christmas Tree Lane would remain intact. In addition, trees and landscaping along the Modified Project's north and northwestern edges would provide screening when viewed from the Coliseum that would reduce the perception of the Modified Project's height and mass. In addition, the proposed reconfiguration and re-landscaping of the VIP parking lot would enhance the aesthetic character of the southern portion of the Project Site as compared to existing conditions. Thus, the visual appearance of the Modified Project would be appropriate in the context of existing development on and immediately surrounding the Project Site and the Modified Project would not degrade the general visual character of the Project Site.

The proposed signage program would represent an important component of the Modified Project and a strong visual element that would influence the aesthetics of the Project Site. As previously described, the Modified Project's signage program would allow a variety of sign types with requirements based on specific locations. The types and extent of permitted signage would emphasize the event- and entertainment-oriented aspect of the Project Site and complement the existing and approved signage environment in Exposition Park. The signage program is intended to support stadium operations and revitalize the

[3] *The Olympic Torch spire atop the central arch of the Coliseum peristyle reaches a height of approximately 124 feet above grade.*

Project Site as a major sports and entertainment venue, consistent with its historic use. Central to this concept is the goal of establishing a unique visual identity for the Project Site, which would be achieved in part through dynamic signage. As discussed in Section III, Project Description, on page 4 of this Addendum, the proposed SUD would place limitations on the types, amounts, locations, sizes, operating hours, and illumination of permitted signs. By design, Modified Project signage would be consistent with the character of a sports and entertainment venue (i.e., a well-lit and active environment with substantial pedestrian activity including nighttime activity), such as that which already exists on-site and within the surrounding area, including at the adjacent Coliseum. In addition, as discussed below, proposed signage would not result in significant light and glare impacts. Thus, proposed signage would not result in significant impacts associated with visual character when compared with the existing and contemplated visual character of the area as set forth in existing planning policies such as the Coliseum District Specific Plan. Overall, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.A, Aesthetics, of the Certified EIR), the Modified Project would result in less-than-significant impacts associated with visual character, and no mitigation measures are required.

With regard to views, as stated in the Certified EIR, due to the developed nature of the Project Site vicinity, existing views from the ground level are limited by existing structures and ornamental landscaping. Views of aesthetic resources in the Project Site vicinity include views of the Coliseum and landscaped open space areas within Exposition Park, as well as intermittent distant views of the downtown skyline. As discussed above, the stadium under the Modified Project would be located in the same general location of the existing Sports Arena. While the building height and massing would increase as compared to the existing Sports Arena and the Original Stadium Project, the building height would be modulated to locate shorter building heights closer to the Coliseum. However, there are very limited views of the Coliseum across the Project Site from the public right-of-way along Figueroa Street due to the presence of the Sports Arena and existing trees and landscaping. Accordingly, while the Modified Project would be taller than the Original Stadium Project, it would not result in the blockage of existing unobstructed views of the Coliseum. Further, the Modified Project has been sited so as to not block views of the Coliseum when entering Exposition Park from Figueroa Street (i.e., along Christmas Tree Lane), which is the most important public view corridor in the vicinity in terms of conveying the aesthetic and historic importance of the Coliseum (refer to Section IV.E, Cultural Resources, on page 61 of this Addendum). With regard to views of the downtown skyline, as is the case under existing conditions, and as would have been the case under the Original Stadium Project, such views would continue to be available on an intermittent basis. As compared to the Original Stadium Project, the openings in the Modified Project stadium's northeast and northwest corners would provide enhanced viewing opportunities of the downtown skyline, that are by design intended to provide dramatic and prominent views of this visual resource. With regard to landscaped open space areas within

Exposition Park, as was the case under the Original Stadium Project, the accessibility of such views would vary depending on the vantage point of the viewer. However, in general, the Modified Project would provide enhanced connections to adjacent open space areas through the Northwest Plaza and associated pedestrian walkways, providing more opportunities to access and view open space areas within Exposition Park. Thus, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.A, Aesthetics, of the Certified EIR), potential impacts associated with views under the Modified Project would be less than significant. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect visual character and views, including impacts related to signage, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(b) Light and Glare

(i) Construction

Potential impacts associated with construction-related lighting and glare were not assessed in detail in the Certified EIR. As set forth on page IV.A-22 of the Certified EIR, impacts with respect to light and glare would be significant if the Project would result in a new substantial source of light or glare, which would adversely affect day or nighttime views in the area.

The Modified Project would implement Mitigation Measure CR G-2 of the Certified EIR, which restricts exterior construction and demolition activities to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday. Thus, construction lighting would be limited to very short durations during the winter season and would be temporary. Further, construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Additionally, in accordance with Project Design Feature A-1, the perimeter of the Project Site would be screened and would limit views of construction activities. Therefore, uses which are not adjacent to the Project Site would not be anticipated to be substantially affected by construction light or daytime glare. Thus, through implementation of the identified mitigation measure and Project Design Feature, and with adherence to existing LAMC regulations, light and glare impacts associated with proposed construction under the Modified Project would be less than significant. As such, construction of the Modified Project would not result in any new significant impacts with respect to construction-related lighting. No additional mitigation measures are required.

(ii) Operation

The Certified EIR for the Original Stadium Project concluded that impacts with respect to lighting during operation would be less than significant through compliance with mitigation measures (refer to Section IV.A, Aesthetics, of the Certified EIR). As set forth on page IV.A-22 the Certified EIR, impacts with respect to light and glare would be significant if a project would result in a new substantial source of light or glare, which would adversely affect day or nighttime views in the area. In the context of the applicable thresholds identified in the Certified EIR and applicable LAMC requirements related to lighting, the previously referenced Lighting Study was prepared for the Modified Project to determine whether potential lighting and glare from Modified Project operations would result in any new significant impacts that were not identified in the Certified EIR, or whether the previously identified significant impacts would be substantially more severe (see Appendix B of this Addendum). The Lighting Study specifically considers light and glare impacts to be significant if the Modified Project: (1) generates light intensity levels of 2.0 foot-candles or more at the property boundary from exterior on-site light sources[4]; (2) generates light emissions associated with an illuminated sign that produces a light intensity exceeding 3.0 foot-candles at the property line of a residence or other sensitive receptor; (3) creates new high contrast conditions visible from a field of view from sensitive receptor; or (4) incorporates substantial amounts of highly reflective building materials or signage (i.e., daytime glare) in areas that are highly visible to off-site glare-sensitive uses.

As discussed in the Certified EIR, the Original Stadium Project would include stadium lights and other sources of lighting such as pole-mounted lighting for parking lot areas, pedestrian walkways, and security lighting for pedestrian plaza areas that could result in light spillage onto adjacent properties and land uses. In particular, when compared with the existing indoor Sports Arena facility, nighttime events and games held at the Original Stadium Project would generate a high degree of artificial lighting in the night sky. However, under the Original Stadium Project, proposed lighting would be designed in a manner that limits spillover and light pollution to the maximum extent feasible. For example, the Certified EIR explained that the lighting system would employ directional lighting fixtures to illuminate the field level. In addition, Mitigation Measure A-1 required that outdoor lighting shall be designed and installed with shielding such that the light source cannot be seen from adjacent residential properties or the public right-of-way. With regard to daytime glare, Mitigation Measure A-2 limited the types of building materials to be employed in order to address potential daytime glare impacts. Thus, with the

[4] *The LAMC addresses lighting intensity levels at the property line of the nearest off-site residence of other light-sensitive use. To provide a conservative analysis, potential lighting impacts are based on the Specific Plan boundary or in the case of the eastern site boundary of the Project Site, the centerline of Figueroa Street.*

implementation of these measures, the Certified EIR concluded that Original Stadium Project's potential aesthetic impacts associated with light and daytime glare would be less than significant.

As with the Original Stadium Project, the Modified Project includes lighting and signage to support stadium operations. Lighting would include lighting of the stadium, including the field and associated amenities and ancillary uses (e.g., outdoor dining and seating areas, plazas, and walkways). As discussed above, new signage would be provided as part of a signage program for the Modified Project to emphasize the event and entertainment-oriented aspect of the Project that would be implemented via the proposed SUD. As described in detail in Section III, Project Description, on page 4, and within Appendix C of this Addendum, signage types for the Modified Project could include identification signs, temporary event signs, electronic digital displays, changeable message LED boards, static signs, identification signs and retail/tenant identification signs, with both on-site and off-site signage allowed. Lighting emissions resulting from the illuminated signage are expected to be emitted from three types of signs: front-lit signs, electronic digital displays, and changeable message LED boards.

A detailed analysis of the potential light and glare impacts associated with proposed lighting and signage under the Modified Project is provided in the Lighting Study included as Appendix B of this Addendum. As discussed in detail in the Lighting Study, a computer model was used to evaluate the Modified Project's potential lighting impacts. To analyze potential lighting impacts, both illuminance and glare from the Modified Project were evaluated. As discussed in the Lighting Study, illuminance is defined as the measured amount of illumination that falls on a given area from a light source, and glare (also referred to as contrast) is defined as the magnitude of the sensation that results when an individual views a surface from which light comes to the eye. A summary of these analyses is provided below. Also included in the evaluation of potential glare impacts below is an analysis of daytime glare.

Illuminance

As described in detail in the Lighting Study, the illuminance analysis for the Modified Project was conducted using a detailed computer model and in accordance with recommended practices established by the Illuminating Engineering Society of North America (IESNA). For the field and on-site lighting, the model evaluated potential lighting impacts at the centerline of Figueroa Street, at the southern Specific Plan boundary at the north edge of Martin Luther King, Jr. Boulevard, at the northern Specific Plan boundary at the north edge of Christmas Tree Lane and at the Specific Plan boundary west of Hoover Street. The analysis conservatively assumed simultaneous lighting of the field and associated amenities and Ancillary Uses within the Project Site. For signage, consistent with applicable LAMC requirements, the model evaluated potential lighting impacts at the

Figueroa Street east boundary, at the southern edge of Martin Luther King, Jr. Boulevard, at the north edge of Christmas Tree Lane and at the Specific Plan boundary west of Hoover Street. The analysis conservatively assumed simultaneous lighting of all proposed illuminated signage (including digital signage).

In addition, the analysis assumed incorporation of specific Project Design Features relative to lighting that would be implemented as part of the Modified Project and would reduce impacts associated with lighting. Specifically, as set forth in Project Design Feature A-2, stadium field lighting would be designed based on Major League Soccer (MLS) standards that stipulate the use of high performance lights with good color and good glare control. In accordance with Project Design Feature A-3, the Project's field lighting would include high-intensity LED fixtures in specified areas and a no lighting fixture zone would be specified as shown in Figure 34 of the Lighting Study. Furthermore, in accordance with Project Design Feature A-4, design elements would be incorporated to limit the direct view of the light source surface of all stadium light fixtures and to ensure that the light source cannot be seen from adjacent residential properties or the public right-of-way. In accordance with Project Design Feature A-5, all light sources, including illuminated signage, would comply with CALGreen (Part 11 of Title 24, California Code of Regulations). Finally, in accordance with Project Design Feature A-6, signage brightness would not exceed 800 candelas per square meter at night.

As summarized in Table 3 on page 44, potential illuminance impacts resulting from field and other on-site lighting proposed under Modified Project would be well below the 2.0-foot-candle significance threshold. In addition, the maximum calculated illuminance would be less than the IESNA recommendations of 8 lux (0.76 foot-candle) for Lighting Zone 3 in which the Project Site is located. As discussed in detail in the Lighting Study, the highest illumination levels would be along Figueroa Street. However, this area is already well illuminated with existing horizontal illuminance levels above 3.0 foot-candles directly across Figueroa Street from the Project Site. Furthermore, Mitigation Measures A-1 and A-2 set forth in the Certified EIR would continue to be incorporated to ensure that impacts associated with illumination from on-site lighting would be less than significant. Thus, no additional mitigation measures are required.

As discussed above, lighting emissions resulting from the illuminated signage proposed by the Modified Project are expected to be emitted from three types of signs: front-lit signs, electronic digital displays, and changeable message LED boards. In accordance with Project Design Feature A-5, illuminated signage would comply with the requirements outlined in CALGreen, and as such, would require 65 percent dimming of signage at night. In addition, in accordance with Project Design Feature A-6, signage brightness would not exceed 800 candelas per square meter at night. As described in detail in the Lighting Study and summarized in Table 4 on page 45, lighting impacts

Table 3
Field and Site lighting Illuminance Calculation Results

Location	Description	Illuminance (foot-candles)			Impact[a]
		Average	Maximum	Minimum	
1-1	Vertical Plane 80 feet high at Centerline of Figueroa St.	0.066	0.735	0.000	Below Threshold
1-2	Vertical Plane 80 feet high at north edge of Martin Luther King, Jr. Blvd.	0.010	0.259	0.000	Below Threshold
1-3	Vertical Plane 80 feet high at north edge of Christmas Tree Ln.	0.014	0.034	0.000	Below Threshold
1-4	Vertical Plane 80 feet high at Specific Plan Boundary west of Hoover St.	0.000	0.000	0.000	Below Threshold

[a] *Threshold is 2.0 foot-candles or more.*

Source: Francis Krahe & Associates, 2015.

resulting from the proposed illuminated signage on neighboring residential properties would be below the 3.0-foot-candle threshold. Thus, potential illumination impacts associated with signage would be less than significant and no mitigation measures are required.

Glare

With regard to glare/contrast from Modified Project lighting, the most sensitive locations for potential glare impacts are those sites closest to the Project Site. Thus, the most sensitive locations are to the east of the Project Site followed by the locations to the south of the Project Site. These locations were evaluated in detail in the Lighting Study.

As discussed above, the Modified Project would include a variety of lighting types, including high-intensity LED field lighting and LED pole lighting. However, as discussed in detail in the Lighting Study, the design of the Modified Project, together with the proposed Project Design Features, would limit direct view of any light sources from areas outside of the Specific Plan boundary. Specifically, as demonstrated by the detailed analysis in the Lighting Study, the receptors to the east of Figueroa Street would not experience high glare conditions due to design features of the Modified Project that screen the field surface and direct view of the field light fixtures, the use of opaque façades and walls that eliminate direct light, and the use of directed and shielded lighting per CALGreen. As such, the resulting contrast from lighting under the Modified Project would be low to medium, resulting in no glare impacts from new lighting sources. With respect to potential glare from

Table 4
Illuminated Signage Calculation Results

Location	Description	Illuminance (foot-candles)			Impact[a]
		Average	Maximum	Minimum	
2-1	Vertical plane 80 feet high at the east edge of Figueroa St.	1.150	2.900	0.100	Below threshold
2-2	Vertical plane 80 feet high at the south edge of Martin Luther King, Jr. Blvd.	0.120	0.600	0	Below threshold
2-3	Vertical plane 80 feet high at the north edge of Christmas Tree Ln.	0.220	0.300	0.100	Below threshold
2-4	Vertical plane 80 feet high at the Specific Plan Boundary west of Hoover St.	0	0	0	Below threshold

[a] *Threshold is 3.0 foot-candles or more.*

Source: Francis Krahe & Associates, 2015.

signage, as stated above, in accordance with Project Design Feature A-6, signage brightness would not exceed 800 candelas per square meter at night, which would ensure that adjacent sensitive receptors do not experience substantial glare effects from Modified Project signage. In addition, as required by the Outdoor Advertising Act, Modified Project signage would not contain flashing images that are visible from freeways. Electronic digital display signage with changing messages, including those visible from the freeway, would consist of static images that remain at a constant brightness for no less than 8 seconds, and then complete an instant refresh to the next image which would then be static for no less than 8 seconds.[5] Accordingly, potential nighttime glare impacts from the Modified Project, including the proposed signage program, would be less than significant and no mitigation measures are required.

With regard to potential impacts from daytime glare, Mitigation Measure A-2 in the Certified EIR requires that the exterior of the proposed structure shall be constructed of materials including, but not limited to high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize

[5] *The Outdoor Advertising Act defines "flashing" as a light or message that changes more than once every 4 seconds.*

glare and reflected heat. With continued implementation of this Mitigation Measure, potential daytime glare impacts under the Modified Project would be less than significant.

(c) Shading

Potential impacts associated with shading were not assessed in detail in the Certified EIR. As set forth in the L.A. CEQA Thresholds Guide, a project would have a significant shading impact if off-site shadow-sensitive uses would be shaded by project-related development for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (between early November and early March), or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (between early March and early November).[6]

As discussed above, the proposed structures under the Modified Project would range in height from approximately 75 feet within the northwestern portion of the Project Site to a maximum of approximately 105 feet above street level, with rooftop structures extending to approximately 115 feet. The closest off-site shadow-sensitive uses to the Specific Plan area are residential uses located across Figueroa Street to the east followed by residential uses to the of south of Martin Luther King, Jr. Boulevard. Based on the proposed building heights, the maximum shadows that would be generated by the proposed structures would extend approximately 345 feet in a northern orientation during the winter. Given the location of the shadow-sensitive uses to the east and south of the site, as well as the presence of intervening roadways (i.e., Figueroa Street and Martin Luther King Jr., Boulevard) and surface parking areas, the Modified Project would not shade off-site shadow-sensitive uses for more than three hours during any time of the year. As such, the Modified Project's potential shading impacts would be less than significant and no mitigation measures are required.

Based on the analysis above, through the implementation of mitigation measures identified in the Certified EIR and the proposed Project Design Features, implementation of the Modified Project would not result in any new significant impacts with respect aesthetics, and would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

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[6] *Shade-sensitive uses under the Los Angeles CEQA Thresholds Guide include routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor dining areas; nurseries; and existing solar collectors.*

(d) Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to aesthetics:

PDF A-1: The perimeter of the Project Site shall be screened during primary construction activities to limit views of construction activities

PDF A-2: Stadium field lighting shall be designed based on Major League Soccer (MLS) standards that stipulate the use of high performance lights with good color and good glare control.

PDF A-3: The Project's field lighting shall be implemented in accordance with the zones established in Figure 34 of the Lighting Study.

PDF A-4: Design elements shall be incorporated to limit the direct view of the light source surface for all stadium light fixtures and to ensure that the light source cannot be seen from adjacent residential properties or the public right-of-way. Such design elements could include one or more of the following: use of light fixtures that comply with the ratings specified in CALGreen Table 5.106B; use of light fixtures with a focused output where the output angles greater than 20 degrees from beam centerline do not exceed 500 candelas; glare shields and louvers attached to the front face of the light fixture; and/or architectural screens to conceal the direct view of the LED light fixtures from the center of Figueroa Street to the east and the Coliseum District Specific Plan boundary to the north, south, and west.

PDF A-5: All light sources, including illuminated signage, shall comply with CALGreen (Part 11 of Title 24, California Code of Regulations).

PDF A-6: Signage luminance shall not exceed 800 candelas per square meter after sunset or before sunrise.

The following mitigation measures were included in the Certified EIR to reduce potential aesthetics impacts to less than significant levels. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP included with this Addendum (see Appendix A of this Addendum):

EIR Mitigation Measure MM A-1: Outdoor lighting shall be designed and installed with shielding such that the light source cannot be seen from adjacent residential properties or the public right-of-way.

EIR Mitigation Measure MM A-2: The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance

and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

B. Agriculture and Forestry Resources

The Certified EIR for the Original Stadium Project concluded that no impacts to agricultural resources would occur under the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR). Significant impacts to agricultural resources could occur if a project were to convert designated farmland to non-agricultural use, conflict with existing zoning for agricultural use or a Williamson Act contract, or otherwise result in the conversation of farmland. The Project Site is currently developed with the Sports Arena and is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. There are no existing or mapped agricultural resources within the Project Site and such uses are not proposed as part of the Modified Project. No agricultural zoning is present in the surrounding area, and no nearby lands are enrolled under the Williamson Act. Thus, the Modified Project would not result in the conversion of designated farmland. In addition, the Modified Project would not conflict with agricultural zoning or a Williamson Act contract. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), no impacts to agricultural resources would occur under the Modified Project. No mitigation measures are required. Therefore, the Modified Project would not result in any new significant impacts with respect to agricultural resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

Potential impacts to forestry resources were not assessed in detail in the Certified EIR for the Original Stadium Project (Appendix G of the CEQA Guidelines was amended to include forestry resources effective March 2010). Significant impacts to forestry resources could occur if a project were to result in the loss or conversion of forest land, or conflict with existing zoning for forest land or timberland. The Project Site is located in an urbanized area and does not include any forest land or timberland. Additionally, the Project Site is not zoned for forest land, and is not used as forest land. Therefore, development of either the Original Stadium Project or the Modified Project would not conflict with existing zoning for, or cause rezoning of, forest land or timberland as defined by the Public Resources Code. Accordingly, no impacts to forestry resources would occur and no mitigation measures are required. Therefore, the Modified Project would not result in any new significant impacts with respect to forestry resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

C. Air Quality

(a) Construction

The Certified EIR for the Original Stadium Project concluded that air quality impacts from construction of the Original Stadium Project would be significant and unavoidable for regional emissions and less than significant for localized emissions (refer to Section IV.B, Air Quality, of the Certified EIR). The thresholds on which this analysis was based are stated on pages IV.B-21–IV.B-24 of the Certified EIR. As stated in the Certified EIR, the Original Stadium Project would generate pollutant emissions from the following construction-related activities and sources: demolition and site clearing, grading and site preparation; building construction, including the application of architectural coatings; paving and asphalting; construction workers traveling to and from the Project Site; delivery and hauling of construction supplies and debris to and from the Project Site; and, the fuel combustion generated by on-site construction equipment.

The Modified Project would consist of the Original Stadium Project (reconfigured on the Project Site) together with the addition of up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet). In addition, as described in Section III, Project Description, on page 4 of this Addendum, the Modified Project would have a slightly longer construction period (by 0.5 month) and a total import/export of up to 30,000 cubic yards (cy) of soil compared to the Original Stadium Project's estimated import of approximately 125,000 cy of soil. Therefore, construction haul trips are anticipated to be less under the Modified Project. However, as a result of the modifications proposed under the Modified Project, potential construction-related emissions associated with the Modified Project were quantified to determine whether the changes in the proposed development program would have the potential to increase the severity of previously identified significant impacts or result in new, previously unidentified significant impacts related to construction air emissions.

With regard to regional emissions, the Certified EIR determined that the peak daily emissions generated during construction of the Original Stadium Project would exceed the regional emissions threshold recommended by the South Coast Air Quality Management District (SCAQMD) for nitrogen oxides (NO_X) during the grading/site preparation phase, as well as the threshold for reactive organic compounds (ROG) during the building and coating phase. The Certified EIR included Mitigation Measures MM B-1 and MM B-2, requiring compliance with SCAQMD Rule 403 and the use of low-volatile organic compound (VOC) paints, respectively, to reduce these impacts to the extent feasible. However, even with implementation of these mitigation measures, the Certified EIR determined that levels of NO_X and ROG would exceed applicable thresholds. Therefore, the Certified EIR concluded that regional air quality impacts associated with construction emissions would be significant and unavoidable under the Original Stadium Project.

Construction of the Modified Project would generate regional pollutant emissions from the same general sources as the Modified Project, as described above (e.g., heavy-duty construction equipment, haul truck trips, and construction worker trips). Construction-related emissions associated with these sources were calculated using CalEEMod. Model results are provided in Appendix D of this Addendum. The calculations reflect the estimated types and quantities of construction equipment that would be used to remove existing structures and pavement; grade and excavate the Project Site; construct the proposed structures and related improvements; pave new parking; and plant new landscaping within the Project Site under the Modified Project. The analysis assumes that all construction activities would comply with SCAQMD Rule 403 regarding the control of fugitive dust (as reflected in Mitigation Measure MM B-1 in the Certified EIR) and that construction activities would utilize low-VOC paints (as reflected in Mitigation Measure MM B-2 in the Certified EIR). In addition, the Modified Project would incorporate Project Design Feature C-1 related to the control of exhaust emissions from on-site heavy-duty construction equipment, which is reflected in the emission calculations presented in Table 5 on page 51. The Modified Project would also implement Project Design Feature C-2 to encourage Project contractors to apply for SCAQMD Surplus Off-Road Opt-In for NO_X (SOON) funds, if applicable and available at the time of construction. The SOON program provides funding assistance to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NO_X emissions from in-use off-road diesel vehicles. Implementation of Project Design Feature C-2 is not reflected in the Modified Project's emission calculations.

As shown in Table 5, peak daily construction emissions under the Modified Project would be less than those under the Original Stadium Project for all pollutants. However, as with the Original Stadium Project, peak daily emissions of NO_X and VOC would exceed the SCAQMD regional thresholds even with implementation of Mitigation Measures MM B-1 and MM B-2 set forth in the Certified EIR, which have been incorporated into the Modified Project's MMP included as Appendix A to this Addendum. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.B, Air Quality, of the Certified EIR), impacts with respect to regional air emissions during construction would be significant and unavoidable under the Modified Project. However, emissions would be less than levels analyzed in the Certified EIR. No other feasible mitigation measures have been identified to reduce impacts to a less-than-significant level.

With respect to localized emissions, the Certified EIR determined that on-site emissions generated by the Original Stadium Project during the different phases of construction would not exceed the established SCAQMD localized thresholds for NO_X (in the form of nitrogen dioxide (NO_2)), carbon monoxide (CO), particulate matter less than 10 microns in size (PM_{10}), and particulate matter less than 2.5 microns in size ($PM_{2.5}$).

Table 5
Modified Project Regional Construction Emissions[a]
(pounds per day)

Emission Source	VOC	NO_X	CO	$SO_{2.5}$	PM_{10}[b]	$PM_{2.5}$[b]
Modified Project						
2016	10	128	133	<1	18	9
2017	76	58	100	<1	11	5
2018	84	81	129	<1	14	7
Maximum Concurrent Peak Daily	**84**	**128**	**133**	**<1**	**18**	**9**
Comparison to SCAQMD Thresholds						
Modified Project Emissions	84	128	133	<1	18	9
SCAQMD Significance Threshold	75	100	550	150	150	55
Over/(Under)	9	28	(417)	(150)	(132)	(46)
Significant?	**Yes**	**Yes**	**No**	**No**	**No**	**No**
Comparison to Original Stadium Project						
Modified Project Emissions	84	128	133	<1	18	9
Original Stadium Project Emissions[c]	103	133	58	<1	33	11
Increase (Decrease)	**(19)**	**(5)**	**75**	**(<1)**	**(15)**	**(2)**

[a] *Compiled using the CalEEMod emissions inventory model. The equipment mix and use assumption for each phase is provided in Appendix D of this Addendum.*

[b] *PM_{10} and $PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression/*

[c] *See Table IV.B-8 on page IV.B-29, Section IV.B, Air Quality, of the Certified EIR. Emissions shown are peak daily emissions during maximum impact phase.*

Source: Eyestone Environmental, 2015.

Therefore, the Certified EIR concluded that impacts related to localized air emissions during construction would be less than significant under the Original Stadium Project.

With respect to quantifying mass emissions for localized analysis, only emissions that occur on-site are considered. Consistent with the SCAQMD Localized Significance Threshold (LST) methodology guidelines, emissions related to off-site delivery/haul truck activity and employee trips are not considered in the evaluation of localized impacts. As shown in Table 6 on page 52, localized construction emissions from the Modified Project would increase in comparison to levels analyzed in the Certified EIR for the Original Stadium Project. However, as with the Original Stadium Project, localized emissions of all criteria pollutants (CO, NO_X, PM_{10}, and $PM_{2.5}$) would remain below their respective SCAQMD LST significance thresholds. As such, consistent with the conclusions in the

Table 6
Modified Project Localized Construction Emissions
(Pounds per Day)

Emission Source	NO_X	CO	PM_{10}	$PM_{2.5}$
Modified Project				
2016	69	80	12	7
2017	49	50	3	3
2018	46	50	3	3
Maximum Peak Daily Emissions	**69**	**80**	**12**	**7**
Comparison to SCAQMD LSTs				
Modified Project Emissions	**69**	**80**	**12**	**7**
SCAQMD Significance Threshold[a]	91	1,861	16	8
Over/(Under)	(22)	(1,781)	(4)	(1)
Significant?	**No**	**No**	**No**	**No**
Comparison to Original Project				
Modified Project Emissions	69	80	12	7
Original Project Emissions[b]	57	31	5	3
Increase (Decrease)	**12**	**49**	**7**	**4**

[a] *SCAQMD LSTs based on Source Receptor Area (SRA) 1, 5-acre active site area, and 25-meter receptor distance. The SCAQMD localized threshold for NO_X was revised compared to the threshold applied in the Certified EIR to account for the recently adopted 1-hour NO_2 National Ambient Air Quality Standards (NAAQS) of 188 microgram per cubic meter ($\mu g/m^3$), or an incremental threshold of 64 $\mu g/m^3$ for SRA 1.*

[b] *See Table IV.B-9 on page IV.B-31, Section IV.B, Air Quality, of the Certified EIR. Emissions shown are peak daily emissions during maximum impact phase.*

Source: Eyestone Environmental, 2015.

Certified EIR for the Original Stadium Project (refer to Section IV.B, Air Quality, of the Certified EIR), impacts with respect to localized air quality during construction would be less than significant under the Modified Project. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to air quality during construction, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(b) Operation

The Certified EIR for the Original Stadium Project concluded that air quality impacts from operation of the Original Stadium Project would be less than significant (refer to Section IV.B, Air Quality, of the Certified EIR). The thresholds on which this analysis was based are stated on pages IV.B-21–IV.B-24 of the Certified EIR. As stated in the Certified EIR, operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after completion of the Original Stadium Project. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices and the operation of landscape maintenance equipment. Mobile source emissions would be generated by the motor vehicles traveling to and from the Project Site. Similar to the Original Stadium Project, air pollutant emissions associated with occupancy and operation of the Modified Project would be generated by the consumption of both electricity and natural gas on-site (stationary) and the operation of vehicles traveling to and from the Project Site (mobile). Therefore, each of these types of emissions is addressed below.

The Certified EIR (refer to Section IV.B, Air Quality, of the Certified EIR) concluded that no new significant air quality impacts would result from stationary sources (i.e., electricity or natural gas consumption) as the Original Stadium Project would replace an existing venue that is over 50 years old with a state-of-the-art venue that would include numerous sustainability and design features that would result in significantly increased energy efficiencies at the Project Site. Like the Original Stadium Project, the Modified Project includes a 22,000-seat MLS stadium (reconfigured on the Project Site) and the addition of up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet). While the Ancillary Uses would result in some additional electricity and natural gas consumption beyond levels analyzed in the Certified EIR on event days, any such increase would largely be offset by the Modified Project's compliance with applicable provisions of the 2013 CalGreen Code in accordance with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC, as amended pursuant to City of Los Angeles Ordinance No. 182,849). Specifically, the 2013 CalGreen Code is anticipated to be 30 percent more efficient than the 2008 Title 24 requirements for nonresidential construction that were applicable to the Original Stadium Project.[7] In addition, as shown in Table 7 on page 54, pollutant emissions related to energy sources would be considered a minor source of emissions resulting in less than 1 pound per day for all pollutants. Furthermore, like the Original Stadium Project, the proposed stadium under the Modified Project would be an outdoor venue, which would significantly reduce the

[7] *California Energy Commission, Energy Commission Approves More Efficient Buildings for California's Future, May 31, 2012, www.energy.ca.gov/releases/2012_releases/2012-05-31_energy_commission_approves_more_efficient_buildings_nr.html, accessed August 10, 2015.*

Table 7
Modified Project Operational Emissions Associated with Ancillary Uses on a Non-Event Day[a]
(pounds per day)

Emission Source	VOC	NO_X	CO	$SO_{2.5}$	PM_{10}[b]	$PM_{2.5}$[b]
Modified Project						
Area	3	<2	<1	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	12	25	105	<1	16	5
Total Modified Project Emissions	15	26	106	<1	16	5
SCAQMD Significance Threshold	75	100	550	150	150	55
Over/(Under)	(60)	(74)	(444)	(150)	(134)	(50)
Significant?	No	No	No	No	No	No

[a] *Compiled using the CalEEMod emissions inventory model. CalEEMod output sheets are provided in Appendix D of this Addendum.*

Source: Eyestone Environmental, 2015.

amount of stationary source emissions associated with heating and air conditioning compared to the existing Sports Arena. Therefore, like the Original Stadium Project, and consistent with the conclusions in the Certified EIR, event-day stationary source emissions under the Modified Project would be expected to be reduced compared to existing conditions, and would result in less-than-significant impacts.

With respect to mobile source emissions, the Certified EIR concluded that no new significant air quality impacts would result from a game or event hosted at the proposed stadium as compared to operation of the existing Sports Arena since the maximum capacity of the stadium would be within historic attendance levels at the Sports Arena (refer to Section IV.B, Air Quality, of the Certified EIR). Further, since the Coliseum and the Sports Arena currently hold events with up to 93,000 persons in attendance combined, the Certified EIR also concluded that no new air quality impacts would result from concurrent events in the Coliseum and Original Stadium Project with combined attendees of up to 93,000 persons, and included a mitigation measure (Mitigation Measure MM J-1) to ensure that events in the two venues are scheduled in such a manner as to not exceed this limit. As stated below, Mitigation Measure J-1 would continue to be implemented under the Modified Project, and has been incorporated into the Modified Project's MMP (see Appendix A of this Addendum). Like the Original Stadium Project analyzed in the Certified EIR, the Modified Project proposes a 22,000-seat professional soccer stadium. Pursuant to Project Design Feature O-4 in Section IV.O, Traffic/Transportation/Parking, on page 169 of this Addendum, the Ancillary Uses proposed as part of the Modified Project would be open only to ticket-holding game/event patrons during a period of time before, during and

after the game/event, with no material increase in event-related traffic expected. Therefore, because air quality impacts are assessed based on peak daily conditions, the Certified EIR's conclusions with respect to air quality impacts from event day daily trips would not change under the Modified Project, and potential impacts on event days in the Modified Project would remain less than significant. Additionally, the Certified EIR did not account for the trip reduction associated with the Expo Light Rail stations in proximity to the Project Site, as the Expo Light Rail Line was not in operation at the time the EIR was certified. The Expo Park/USC Station is located approximately 0.35 mile from the Project Site and the Expo/Vermont Station is located approximately 0.7 mile from the Project Site. Given the proximity of these stations, it is anticipated that a substantial number of attendees at the Modified Project would use the light rail on event days, further reducing the less-than-significant event day air quality impacts identified in the Certified EIR.

Because the Modified Project's proposed Ancillary Uses would be open to the public on non-event days, this analysis also addresses and quantitatively evaluates potential air quality impacts related to operation of the Ancillary Uses on non-event days. SCAQMD's CalEEMod was used to calculate regional mobile source emissions, on-road fugitive dust, and emissions from architectural coatings, landscape equipment, and energy use (see Appendix D of this Addendum for CalEEMod calculations). As shown in Table 7 on page 54, regional emissions resulting from operation of the Ancillary Uses are not expected to exceed any of the SCAQMD's daily regional operational thresholds. Therefore, air quality impacts from Modified Project operational emissions on non-event days would be less than significant. No mitigation measures are required.

As discussed in the Certified EIR, the Modified Project would also be subject to the SCAQMD's Air Quality Management Plan (AQMP). A project is considered consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that form the basis of the AQMP. The Certified EIR determined that the Original Stadium Project would be consistent with the 2007 AQMP in effect at the time the Certified EIR was prepared because it would be consistent with applicable population, housing, and employment projections. The AQMP was updated in 2012 subsequent to the preparation of the Certified EIR. The 2012 AQMP adopted by the SCAQMD incorporates the Southern California Association of Governments' (SCAG) *2012–2035 Regional Transportation Plan/Sustainable Communities Strategy* (2012–2035 RTP/SCS) socioeconomic forecast projections of regional population and employment growth. As discussed below under Subsection IV.M, Population, Housing and Employment, on page 134 of this Addendum, employment impacts with respect to the stadium portion of the Modified Project would not change compared to levels analyzed in the Certified EIR. The 282 additional on-site employees that could result from the Modified Project's Ancillary Uses would represent approximately 0.9 percent of the anticipated employment growth in the subregion through 2018. Therefore, additional employees generated by the Modified Project would fall within

SCAG's employment projections for the Subregion. Furthermore, as discussed above, the Modified Project would not result in new significant impacts or substantially increase the severity of any significant impacts previously identified in the Certified EIR with respect to air quality. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.B, Air Quality, of the Certified EIR), impacts with respect to AQMP consistency would be less than significant under the Modified Project. No mitigation measures are required.

With regard to traffic-related localized air quality impacts, which were not analyzed in detail in the Certified EIR, as described further below in Subsection IV.O, Traffic/ Transportation/Parking, on page 149 of this Addendum, the Modified Project would not increase peak-hour trips compared to the Original Stadium Project during event days, which would have the highest peak hour trips compared to non-event days. Therefore, traffic-related localized air quality impacts would be similar to those of the Original Stadium Project (i.e., less than significant). In addition, ambient CO concentrations within the Air Basin have decreased subsequent to completion of the Certified EIR. The CO background concentration at the closest monitoring station to the Project Site (Downtown Central Los Angeles County) shows that the 1-hour CO concentration has decreased from 2.4 parts per million (ppm) in 2011 to 2.0 ppm in 2013. As a result, the potential for the Modified Project to result in CO "hotspots" has decreased as compared to the Original Stadium Project. However, as discussed above, even in the absence of the reduction in CO background concentration the Modified Project would not increase peak-hour trips compared to the Original Stadium Project. Therefore, the Modified Project's potential impacts with respect to CO "hotspots" would be less than significant and no mitigation measures are required.

The Certified EIR determined that potential air toxic impacts would be less than significant under the Original Stadium Project since the Original Stadium Project would not include any land uses involving the use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. The conclusion would not change under the Modified Project. Furthermore, the Modified Project would not locate sensitive receptors within siting distances identified by SCAQMD and California Air Resources Board (CARB) guidelines. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.B, Air Quality, of the Certified EIR), impacts with respect to toxic air contaminants would be less than significant under the Modified Project. No mitigation measures are required.

Potential odor impacts were not analyzed in detail in the Certified EIR. The Modified Project would not include any uses identified by the SCAQMD as being associated with substantial odors (e.g., agricultural uses, wastewater treatment plants, food processing plants, etc.). The Modified Project does include restaurant uses which have the potential to emit odors through cooking and charbroilers. However, the Modified Project would

minimize the release of odors from restaurant uses with odor reducing equipment as required by SCAQMD Rule 1138. Garbage collection areas for the Modified Project would be covered and situated away from the property line and sensitive uses where feasible. Good housekeeping practices would be sufficient to prevent objectionable odors related to trash facilities. Pursuant to Project Design Feature P-3 in Section IV.P, Utilities and Service Systems—Solid Waste, on page 189 of this Addendum, the Modified Project would also include a front-of-house composting program to reduce the amount of solid waste that would be disposed of at area landfills. The composting area would incorporate appropriate odor management practices to reduce odor emissions at adjacent receptors. Examples of such practices include nutrient balance, temperature, moisture content, and aeration control. Based on the distance to the nearest sensitive receptors and the odor control measures that would be employed, the proposed composting facilities would not result in significant odor impacts. Therefore, potential odor impacts under the Modified Project would be less than significant and no mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to operational air quality, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(i) Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to construction period air quality:

Project Design Feature C-1: Off-road diesel-powered construction equipment greater than 50 horsepower, that will be used an aggregate of 40 or more hours during any portion of construction activities, shall meet Tier 3 off-road emissions standards.

Project Design Feature C-2: The Applicant shall encourage construction contractors to apply for South Coast Air Quality Management District Surplus Off-Road Opt-In for NO_X (SOON) funds, should they be applicable and available at the time of construction initiation. The "SOON" program accelerates clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.

The following mitigation measures were included in the Certified EIR to reduce to the maximum extent feasible the significant air quality impacts associated with construction of the Original Stadium Project. These Mitigation Measures would continue to be

implemented as part of the Modified Project, as revised, and have been incorporated into the MMP included with this Addendum (see Appendix A of this Addendum):

EIR Mitigation Measure MM B-1: The ~~Project~~ Applicant shall comply with SCAQMD Rule 403—Fugitive Dust. Examples of the types of dust control measures currently required and recommended include, but are not limited to, the following:

- Water active grading/excavation sites and unpaved surfaces at least three times daily;
- Sweep daily (with water sweepers) all paved construction parking areas and staging areas;
- Provide daily clean-up of mud and dirt carried onto paved streets from the site;
- Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site;
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 15 miles per hour over a 30-minute period or more; and
- An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

EIR Mitigation Measure MM B-2: The ~~Project~~ Applicant shall use low-VOC paints for all interior and exterior surfaces.

D. Biological Resources

The Certified EIR for the Original Stadium Project concluded that no impacts to biological resources would occur under the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR). Significant impacts to biological resources could occur if a project were to conflict with a habitat conservation plan or local ordinance protecting biological resources, or result in adverse effects on endangered and/or threatened species, riparian habitat, wetlands, other sensitive natural communities, or wildlife movement. The Project Site is a developed property located within a highly urbanized area. The Project Site and adjacent areas are predominantly developed with structures or urban open space areas that do not provide native or natural habitats (e.g., open space areas within Exposition Park). As stated in the Certified EIR, the Project Site does not contain any species identified as a candidate, sensitive, or special status species

in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the United States Fish and Wildlife Service. In addition, there are no known locally designated natural communities on the Project Site or in the Project vicinity. Due to the highly urbanized surroundings, there are no federally protected wetlands, riparian habitats, wildlife corridors, or native wildlife nursery sites in the Project vicinity. Thus, as is the case with the Original Stadium Project, the Modified Project would not affect these types of resources. Furthermore, like the Original Stadium Project, the Modified Project would not conflict with the provisions of an adopted habitat conservation plan, natural conservation community plan, or other approved local, regional, or State habitat conservation plan, because there are no known locally-designated natural communities on the Project Site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), no impacts with respect to sensitive species, sensitive habitats, wildlife movement corridors, or habitat conservation plans would occur under the Modified Project. No mitigation measures are required.

The City of Los Angeles Protected Tree Ordinance (Chapter IV, Article 6 of the LAMC) regulates the relocation or removal of all California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These native tree species are defined as protected by the City of Los Angeles. Native trees that have been planted as part of a tree planting program are exempt from this Ordinance and are not considered protected. The Ordinance prohibits, without a permit, the removal of any regulated protected tree, including “acts which inflict damage upon root systems or other parts of the tree...” and requires that all regulated protected trees that are removed be replaced on at least a two-to-one basis with trees that are of a protected variety. The City also requires that a report be prepared by a tree expert discussing the subject tree(s), their preservation, effects of the proposed construction, and mitigation measures pursuant to the removal or replacement thereof.

The Project Site includes a number of ornamental trees within the site interior and along Exposition Park Drive (Christmas Tree Lane) and South Coliseum Drive (Hoover Street), both of which are private roadways. In addition, ten on-site street trees are located within the City right-of-way along South Figueroa Street. Subsequent to the preparation of the Certified EIR, a *Tree Report—Interior Property Trees, Los Angeles Memorial Sports Arena Redevelopment Project* (Interior Tree Report) and *Tree Report—City of Los Angeles Rights-of-Way Trees, Los Angeles Memorial Sports Arena Redevelopment Project* (Street Tree Report) were prepared for the Modified Project by Carlberg Associates (August 2015). These reports are included in Appendix E and Appendix F of this Addendum, respectively. According to the Interior Tree Report, a total of 205 trees are located within the Project Site and along the previously described private roadways within Exposition Park. The interior

trees include ten Coast live oaks (*Quercus agrifolia*) and seven California sycamores (*Platanus racemosa*). Based on a review of historic aerial photographs of the Project Site, the Interior Tree Report determined that the Coast live oaks and California sycamores on the Project Site were planted as part of a tree planting program, and as such, are not considered protected under the City of Los Angeles Protected Tree Ordinance. The Modified Project would remove approximately 177 of the 205 interior trees, including 10 of the Coast live oaks and six of the California sycamores. The specific locations of the existing trees, as well as the trees to be removed, are identified on page 19 of the Interior Tree Report included in Appendix E of this Addendum. As shown therein, and as further discussed in Section IV.E.b, Historic Resources, on page 63, as part of the landscaping program, the street trees bordering South Coliseum Drive would be enhanced to maintain the tree line along Christmas Tree Lane and maintain a park-like setting on the western edge of the Project Site across from the Coliseum. Because the on-site Coast live oaks and California sycamores were planted as part of a tree planting program, the proposed tree removals would not conflict with the City of Los Angeles Protected Tree Ordinance. Additionally, as discussed above in Section IV.A, Aesthetics, on page 34, as part of a coordinated landscape plan, the Modified Project would provide approximately 169 new on-site trees. Accordingly, following development of the Modified Project, the number of interior site trees would be substantially similar to existing conditions, though the type and location of trees would be altered.

With regard to street trees, according to the Street Tree Report, the ten existing street trees along the Project Site's South Figueroa Street frontage are Mexican fan palms (*Washingtonia robusta*). The specific locations of these trees are identified on page 7 of the Street Tree Report included in Appendix F of this Addendum. As stated in the Street Tree Report, demolition, site grading, and construction activities under the Modified Project would not affect the ten identified street trees, and the street tress would be retained in the Modified Project design.

Based on the analysis above, impacts with respect to potential conflicts with local policies or ordinances protecting biological resources, including the City of Los Angeles Protected Tree Ordinance and City of Los Angeles Street Tree Division requirements, would be less than significant under the Modified Project. No mitigation measures are required.

Although unlikely, trees on the Project Site that are proposed for removal could potentially provide nesting sites for migratory birds. Construction activities under the Modified Project would be required to comply with the Migratory Bird Treaty Act and the California Department of Fish and Game Code. Specifically, in accordance with the Migratory Bird Treaty Act, tree removal activities would take place outside of the nesting season (February 15–August 15), to the extent feasible. If vegetation removal activities

must occur during the nesting season, a biological monitor would be present during the removal activities to ensure that no active nests would be impacted. If active nests are found, a 200-foot buffer radius (500 feet for raptors) would be established until the fledglings have left the nest. Through compliance with this existing regulatory requirement, potential impacts to nesting raptors would be less than significant under the Modified Project. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to biological resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

E. Cultural Resources

(a) Archaeological and Paleontological Resources

Potential impacts to archaeological and paleontological resources were not assessed in detail in the Certified EIR. Significant impacts to archaeological resources could occur if a project were to cause a substantial adverse change in the significance of an archaeological resource. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community. Significant impacts to paleontological resources could occur if a project were to directly or indirectly destroy a unique paleontological resource. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of prehistoric species are extinct.

The Project Site is located within an urbanized area of the City of Los Angeles and has been subject to disturbance and excavation in the past, including through the development of the Sports Arena in the late 1950s and subsequent site improvements. Any archaeological and/or paleontological resources that may have existed near the surface of the Project Site are likely to have been disturbed and/or previously removed. The existing Sports Arena is currently constructed within a large excavated depression that extends approximately 25 feet below grade level. The stadium proposed to be developed under the Modified Project would be constructed within a portion of the footprint area currently occupied by the Sports Arena, although the subterranean depression would need to be reconfigured to accommodate the proposed stadium foundation, resulting in a slightly larger footprint. Following demolition of the Sports Arena, grading and excavation would

also be required to install the building pads for the proposed Ancillary Uses. As such, while unlikely, the potential exists for previously undiscovered archeological and/or paleontological resources to be encountered during construction of the Modified Project.

As would have been the case with construction of the Original Stadium Project analyzed in the Certified EIR, if an archaeological resource is discovered during Modified Project construction activities, work in the area would cease and deposits would be treated in accordance with applicable federal, State, and local guidelines, including those set forth in California Public Resources Code (PRC) Section 21083.2. Any discovery of human remains would be treated in accordance with Section 5097.98 of the PRC and Section 7050.5 of the Health and Safety Code. Therefore, through compliance with existing regulations, impacts with respect to archaeological resources would be less than significant under the Modified Project. No mitigation measures are required.

If a paleontological resource is discovered during construction of the Modified Project, Project Design Feature E-1 would be implemented to reflect best management practices to ensure that potential impacts would be less than significant. Project Design Feature E-1 has been incorporated into the Modified Project's MMP included as Appendix A to this Addendum. With the implementation of Project Design Feature E-1, impacts with respect to paleontological resources would be less than significant under the Modified Project.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to archaeological and paleontological resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(i) Project Design Features

The Modified Project would implement the following Project Design Feature related to paleontological resources :

PDF E-1: A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site where excavations into the older Quaternary Alluvium may occur. The services of a qualified paleontologist shall be secured by contacting the Natural History Museum of Los Angeles County. The frequency of inspections shall be based on consultation with the consulting paleontologist and will depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and,

where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains.

If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Any fossils collected should be donated to a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County. Accompanying notes, maps, and photographs shall also be filed at the repository. If fossils are found, following the completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the applicant to the lead agency, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

(b) Historic Resources

The Certified EIR for the Original Stadium Project concluded that impacts with respect to historic resources would be significant and unavoidable even with implementation of mitigation (refer to Section IV.D, Historic Resources, of the Certified EIR).

According to CEQA Guidelines, a project has the potential to impact a historic resource when the project involves a "substantial adverse change" in the significance of an historical resource. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."[8] The Guidelines continue to state that "[t}he significance of an historical resource is materially impaired when a project:… [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources…

[8] *CEQA Guidelines Section 15064.5(b)(1).*

local Register of historic resources… or its identification in a historic resources survey."[9] Based on this guidance, the City of L.A. CEQA Thresholds Guide states that a substantial adverse change in the significance of a historic resource would occur if a project results in:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and (historical/architectural) significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

As set forth in the Certified EIR, the Los Angeles Memorial Sports Arena was constructed in 1959, after more than two decades of planning by various agencies and individuals, to provide the City of Los Angeles with a world-class facility for a variety of indoor sporting and other events. Designed by Welton Becket and Associates, the Sports Arena has hosted many notable civic and sporting events, including the 1960 Democratic National Convention that nominated John F. Kennedy as the Democratic Party's candidate for President, professional and college basketball games, and events at the 1984 Olympic Games. The Sports Arena is now more than 50 years of age and, based on an evaluation by ICF Jones & Stokes included in the Certified EIR, appears eligible for the California Register of Historical Resources under Criteria 1 (Pub. Res. Code Section 5024.1, Title 14 CCR, Section 44852) for its association with events that have made a significant contribution to Los Angeles history. Because the Original Stadium Project proposed the demolition of the Sports Arena, Mitigation Measure MM D-1 was included in the Certified EIR, which requires preparation of a report documenting the architectural and historical features of the Sports Arena. Nonetheless, because the Original Stadium Project would involve the loss of a facility that has association with events that have made a significant contribution to Los Angeles history, the Certified EIR concluded that impacts to historic resources would remain significant and unavoidable following the implementation of mitigation. As the Modified Project would also result in the demolition of the Sports Arena, historic resources impacts associated with its demolition would continue to be significant and unavoidable.

[9] *CEQA Guidelines Section 15064.5(b)(2).*

The Modified Project proposes a stadium with a larger footprint and massing than under the Original Stadium Project. In addition, the Modified Project also would include Ancillary Uses that were not part of the Original Stadium Project. As such, a Historic Resources Technical Report (Modified Project Historic Report) was prepared by Historic Resources Group to analyze the Modified Project's potential impacts to historic resources in the vicinity of the Project Site and is included in Appendix G of this Addendum. As shown in Table 8 on page 66, the Modified Project Historic Report documented several historic resources within the vicinity of the Project Site located within Exposition Park. Due to their close proximity to the Project Site, the evaluation focused on the Coliseum located to the west of the Project Site and North and South Coliseum Drives and Christmas Tree Lane located to the north of the Project Site. Specifically the Modified Project Historic Report evaluated the potential for the Modified Project to affect the integrity of those resources.

The Modified Project Historic Report reiterates the Coliseum Commission's determination from the Certified EIR that removal of the Sports Arena would result in a significant impact to an historic resource that cannot be mitigated to a less-than-significant level. With regard to the Coliseum to the west, the Modified Project Historic Report discusses its designation as a National Historic Landmark, a designated State Historical Landmark, and its listing on the National Register of Historic Places. The Modified Project Historic Report explains that while the Modified Project would not physically alter the Coliseum structure, it would have the potential to affect aspects of the Coliseum's historic integrity. Specifically, the Modified Project Historic Report identifies the Coliseum's park setting characterized by landscape areas, access roads, sidewalks and plazas as features that contribute to the Coliseum's historic integrity.

Based on review and analysis of the Modified Project's plans and comparison of those plans to the Coliseum's historic setting and the existing physical environment with the Sports Arena, the Modified Project Historic Report determined that the Modified Project would not alter the setting in the vicinity of the Coliseum such that the Coliseum would no longer convey its historic significance. Specifically, the Modified Project Historic Report recognizes that the Modified Project would have an increased height and footprint as compared to the existing Sports Arena, and a more contemporary architectural design, which would alter the existing setting of the Coliseum. However, the Modified Project Historic Report determined that following development of the Modified Project the general configuration and orientation of the Coliseum would remain discernible, the primary east-facing façade would remain intact and unobstructed, and trees and landscaping along the Modified Project's north and northwestern edges would provide screening when viewed from the Coliseum that would reduce the perception of the Modified Project's height and mass. The proposed building heights would be visually compatible with and within the context of the adjacent Coliseum, which reaches a height of approximately 75 feet above

Table 8
Historic Resources Within Project Vicinity

Resource	Date Built	Status/Notes
Los Angeles Memorial Sports Arena	1959	Evaluated as eligible for the California Register in the 2010 *Los Angeles Memorial Sports Arena Redevelopment Project Draft Environment Impact Report*.
Los Angeles Memorial Coliseum	1921; 1932	National Historic Landmark, State Historic Landmark #960, listed in the National Register of Historic Places, listed in the California Register of Historical Resources. North and South Coliseum Drives and the Christmas Tree Lane median were specifically called out as character-defining features of the Coliseum setting.
Exposition Park Historic District	1910–1932	Identified as eligible for the National Register by the Office of Historic Preservation on June 15, 1993. The Historic District as described included seven contributing resources: the 1910–1917 Beaux Arts civic group at the north end of the park (Natural History Museum, Exposition Building, State Armory, Rose Garden) and the 1921–1932 recreation group to the south of the civic group (Coliseum, Swimming Stadium, Exposition Clubhouse). A 2001 Historic Property Survey Report (HPSR) prepared for a Section 106 review identified significant alteration and reduced integrity of the Historic District since 1993
Natural History Museum (Los Angeles County Museum of History Science and Art)	1913	Listed in the National Register of Historic Places in 1975.
Wallis Annenberg Building (State Armory)	1914	Listed in the California State Historic Resources Inventory (HRI) with a status code of 7N. Needs to be reevaluated.
Exposition Park Rose Garden	1913–1932	Listed in the National Register of Historic Resources in 1991.
Exposition Club House	1922–1926	Found eligible for the National Register in 1994 through Section 106 review. Designated Los Angeles Historic-Cultural Monument #127 in 1974.
Los Angeles Swimming Stadium	1931	Listed in the California State Historic Resources Inventory (HRI) with a status code of 2S2, or "Individual property determined eligible for the National Register by a consensus through Section 106 process. Listed in the California Register."

Source: Historic Resources Group, 2015.

grade at the Coliseum Bowl and a height of 124 at the top of the peristyle.[10] The Modified Project was specifically designed to respect the height of the Coliseum, so that its maximum height (115 feet) occurs at the edge furthest from the Coliseum (southeast corner), transitioning down to its lowest height of approximately 75 feet at the edge closest to the Coliseum. Furthermore, the roof canopy skin, which would consist of a translucent, ETFE material, would moderate the perceived height of the stadium because it would be permeable to light and would not be perceived as solid. The new stadium would also include signage to support stadium operations (refer to Appendix C of this Addendum). The proposed signage plan would be designed to be consistent with the character of a sports and entertainment venue. Based on its assessment of the Modified Project's massing, height, and signage program in the context of the Coliseum, the Modified Project Historic Report concluded that the Modified Project would not adversely impact the historic significance of the Coliseum. Specifically, the Modified Project Historic Report concludes that the Coliseum's historic significance would not be materially impaired by the Modified Project, and the change in setting under the Modified Project would result in a less than significant impact to the historic significance of the Coliseum.

With regard to North and South Coliseum Drives and Christmas Tree Lane to the north of the Project Site, the Modified Project Historic Report discusses their eligibility for the National Register, due to their contribution to the setting of the Coliseum, as an important view corridor to the Coliseum, and as an example of Beaux Arts landscape and roadway planning. The street pattern, sidewalks, rows of trees, and central green space are critical elements in the formal, park-like setting for the Coliseum. As detailed in the Modified Project Historic Report, after implementation of the Modified Project, the street pattern, sidewalks, rows of trees, and central green space of North and South Coliseum Drives and Christmas Tree Lane would remain intact. Specifically, the street edge along Coliseum Drive would be retained under the Modified Project and the historic configuration of street trees would be enhanced through the Modified Project's landscaping program. Accordingly, because the historic configuration of street pattern, street trees and sidewalks would be maintained by the Modified Project, the Modified Project Historic Report concluded that the Modified Project would avoid potential impacts to the Coliseum Drives and Christmas Tree Lane, which would further avoid potential impacts to the Coliseum's historic setting.

With regard to other identified historic resources in the Project Site vicinity, the Modified Project Historic Report concludes that the Modified Project would not affect any other identified historic resources within the area. All of the other historic buildings and

[10] *The Olympic Torch spire atop the central arch of the Coliseum peristyle reaches a height of approximately 124 feet above grade.*

structures identified in the Modified Project Historic Report are located approximately 700 feet or more from the Project Site and have little or no relation to the Project Site. Thus, construction of the Modified Project would not alter important spatial relationships or impede important views of these resources.

In summary, consistent with the conclusion in the Certified EIR for the Original Stadium Project (refer to IV.D. Historic Resources, of the Certified EIR), impacts with respect to historic resources would continue be significant and unavoidable under the Modified Project due to the demolition of the Sports Arena. In addition, as set forth in the Modified Project Historic Report, impacts to other historic resources within the Project vicinity would be less than significant, as the Modified Project would not demolish, relocate, alter, or involve construction that reduces the integrity or significance of other nearby historic resources, including the Coliseum, North and South Coliseum Drives, and Christmas Tree Lane. Therefore, the Modified Project would not result in any new significant impacts with respect to historic resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(i) Mitigation Measures

As with the Original Stadium Project, impacts under with Modified Project would continue to be significant after implementation of the following mitigation measure included in the Certified EIR, which have been revised as follows to reflect recommendations in the Modified Project Historic Report:

EIR Mitigation Measure MM D-1: Prior to the issuance of a demolition permit, a report documenting the architectural and historical features of the Sports Arena shall be prepared and offered to the Southern California Information Center at California State University, Fullerton, and the City. The report shall include the following:

a) A written report according to the Historic American Building Survey (HABS) narrative format, which includes historical and descriptive information, including site history, historic context, a significance statement, and character-defining features;

b) Duplicates of historic photographs, if available;

c) Duplicates of ~~original~~ existing drawings including plans, elevations, and sections, if available; and

d) Large format (4-inch by 5-inch negative or larger), archival ~~black and white 35 millimeter~~ photographs based on HABS guidelines, and 35 millimeter photographs of additional spaces and features not documented in large format. The photographs shall be keyed to a floor and site plan to show the location of each photograph

taken. Views shall include the setting, important site features including select landscape, all exterior elevations, detailed views of significant exterior architectural features, and interior views of significant spaces and features.

F. Geology and Soils

Potential impacts to geology and soils were not assessed in detail in the Certified EIR. Significant impacts related to geology and soils could occur if a project were to cause or accelerate geologic hazards, including erosion, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury, or if a project were to adversely affect a distinct and prominent geologic or topographic feature. The following analysis is based on the Preliminary Geotechnical Engineering Report (Geotechnical Report) prepared for the Modified Project by Langan Engineering and Environmental Services, dated August 28, 2015, which is included in Appendix H of this Addendum. The Geotechnical Report provides an assessment of the geotechnical and geological aspects of the Project Site, including existing site conditions, and provides preliminary geotechnical, seismic, and foundation recommendations for the Modified Project. The Geotechnical Report is based on reviews of regional geologic hazard and seismicity maps, subsurface information, and previous geotechnical investigations performed in the Project Site area (including readily available geotechnical investigation reports) obtained from the City of Los Angeles Department of Building and Safety (LADBS), as well as a subsurface field investigation conducted on-site in June 2015. The field investigation consisted of drilling two borings on the Project Site to depths of 101.5 and 101 feet below existing grade (elevation 78.5 and 79),[11] respectively. The locations of the borings are shown in Figure 13 of the Geotechnical Report included in Appendix H of this Addendum.

The Project Site is located within the Los Angeles Basin of the Peninsular Ranges Geomorphic Province of Southern California. The Los Angeles Basin's structural history includes extension and strike-slip faulting, followed by oblique contraction via thrusting and strike-slip faulting. No known active faults have been identified on the Project Site. The closest known active faults capable of producing ground shaking at the Project Site are the Puente Hills Blind Thrust Fault, located approximately 0.3 mile southwest of the Project Site, the Newport-Inglewood Fault, located approximately 2.7 miles west of the Project Site, the Elysian Park (Upper) Blind Thrust Fault, located approximately 2.9 miles northeast of the Project Site, and the Santa Monica Fault, located approximately 3.9 miles northwest of the Project Site. Due to the Project Site's proximity to several nearby active faults,

[11] *All elevations referenced herein are in feet with respect to the North American Vertical Datum (NAVD).*

moderate to strong ground shaking could occur from an earthquake on any nearby fault(s), as is typical throughout Southern California. The Modified Project would comply with the current seismic design provisions of the 2013 California Building Code to minimize seismic impacts. The 2013 California Building Code incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program (NEHRP) to mitigate losses from an earthquake and provide for the latest in earthquake safety. Additionally, construction of the Modified Project would be required to adhere to the seismic safety requirements contained in the Los Angeles Building Code (LAMC, Chapter IX, Article 1). The Los Angeles Building Code incorporates by reference the California Building Code, with City amendments for additional requirements. The LADBS is responsible for implementing the provisions of the Los Angeles Building Code. The Modified Project would also be required to comply with the site plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to LADBS review and approval, pursuant to Project Design Feature F-1. The final, site-specific geotechnical report would incorporate the recommendations presented in the Geotechnical Report into the final design of the Modified Project. These recommendations are outlined in Project Design Feature F-1. Through compliance with regulatory requirements and the site-specific geotechnical recommendations outlined in Project Design Feature F-1, the Modified Project would not cause or accelerate geologic hazards related to strong seismic ground shaking, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Impacts related to seismic ground shaking would be less than significant, and no mitigation measures are required.

The Project Site is not within a mapped Alquist-Priolo Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act. Geologic review does not indicate the presence of active surface faulting within or directly adjacent to the Project Site. As such, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low. Impacts with respect to fault rupture would be less than significant, and no mitigation measures are required.

According to the California Geologic Survey, the Project Site is not within a mapped liquefaction potential investigation zone. As such, the potential for liquefaction to occur at the Project Site is considered low. Therefore, impacts related to liquefaction and seismically-induced ground deformations would be less than significant. Additionally, with adherence to the recommended parameters for shallow foundations outlined in the Geotechnical Report, which are outlined in Project Design Feature F-1 and would be incorporated into the final, site-specific geotechnical report prepared for the Modified Project subject to LADBS review and approval, impacts related to settlement and cyclic densification of unsaturated sands and gravels due to earthquake ground motions would also be less than significant. Therefore, no mitigation measures are required.

Based on the California Geologic Survey and the City of Los Angeles' Safety Element, the Project Site is not within a mapped Earthquake-Induced Landslide Hazard Zone or a mapped landslide area according to the landslide inventory and hillside area map. As discussed below, the Project Site and the immediately surrounding area are generally flat in nature, and there are no unique geologic or topographic features located on the Project Site, such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. Therefore, impacts related to landslides and landform alteration would be less than significant, and no mitigation measures are required.

The Project Site consists predominantly of previously developed, impervious surface area. As evaluated in Section IV.I, Hydrology and Water Quality, on page 95 of this Addendum, Modified Project-related construction activities would occur in accordance with erosion control requirements, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. As part of these requirements, the Modified Project would adhere to Best Management Practices (BMPs) prescribed as part of a Storm Water Pollution Prevention Plan (SWPPP) pursuant the National Pollutant Discharge Elimination System (NPDES). Through compliance with applicable regulatory requirements that include the implementation of BMPs, impacts related to erosion and sedimentation would be less than significant, and no mitigation measures are required.

The Project Site is generally flat at about elevation (el) 180 feet,[12] with the exception of the sunken court and seating within the Sports Arena structure. The proposed stadium would be constructed within a portion of the excavation and footprint area currently occupied by the Sports Arena, which currently extends to a depth of approximately 25 feet below grade level (approximately el 155). The excavation areas following removal of the Sports Arena not occupied by the proposed stadium footprint would be backfilled to existing grade. Based on the information provided in the Geotechnical Report, the excavation required for the proposed development would not extend deeper than the current below-grade areas of the Sports Arena. Historical groundwater was reported to be 45 to 55 feet below the ground surface within the Project Site area, which is well below the lowest proposed grade development involved under the Modified Project. Furthermore, groundwater was not encountered within the maximum 101.5-foot depth (el 78.5) explored in the deepest boring drilled for the Geotechnical Report. Additionally, based on the 2015 Phase I ESA performed for the Project Site, which is discussed in Section IV.H, Hazards and Hazardous Materials, on page 91 of this Addendum, groundwater was measured in a monitoring well located approximately one mile northwest of the Project Site at approximately 162 feet below ground surface (el 41.5). Therefore, it is not expected that groundwater would be encountered during Modified Project construction. Nonetheless, the

[12] *Ibid.*

potential exists for shallower, perched water to be encountered at the Project Site depending on seasonal rainfall. Thus, while not anticipated, temporary construction dewatering may be required. Should it be required, construction dewatering would be performed using conventional gravity routing and collection in sump pits, with pumping performed as needed to dispose of any water accumulated in these areas, as outlined in Project Design Feature F-1. Additionally, construction dewatering would be subject to NPDES permit requirements. Through compliance with existing regulations and the project-specific design measures outlined in Project Design Feature F-1, which would be incorporated into the Modified Project's final geotechnical report subject to LADBS review and approval, impacts related to groundwater would be less than significant, and no mitigation measures are required.

According to the Geotechnical Report, the Project Site is underlain by engineered fill and alluvial soils. The fill stratum generally extended to depths ranging from approximately 7 to 10 feet (el 173 to 170) within the borings explored; however, based on a review of previous compaction reports, fill depths are anticipated to be as deep as 25 feet below existing grade (approximately el 155). The fill is subsequently underlain by alluvial deposits, which are generally comprised of medium dense to dense sands and silty sands with variable amounts of clay, gravel, and cobbles. Medium dense to dense sand and silty sands with various amounts of gravel and cobbles extend to depths up to approximately 25 feet below the existing Sports Arena basement level (approximately el 131.5), and subsequently underlain by sand and silty sand layers with interbedded layers of silt and clay. Expansion and corrosion testing indicated that the soils are non-expansive and non-corrosive The Geotechnical Report concluded that the integrity of the soils underlying the Project Site is such that the Modified Project could be adequately supported provided that the Modified Project complies with the site plan review and permitting requirements of the LADBS, including the recommendations provided in a final, site-specific geotechnical report subject to LADBS review and approval, pursuant to Project Design Feature F-1. The final, site-specific geotechnical report would incorporate the recommendations presented in the Geotechnical Report into the final design of the Modified Project, as outlined in Project Design Feature F-1. No soil or geologic conditions were encountered that would pose a substantial safety risk during Modified Project construction or operation. Through compliance with applicable regulatory requirements and site-specific geotechnical recommendations that would be incorporated into the final plans, impacts related to soil stability would be less than significant, and no mitigation measures are required.

The Project Site is not within a Methane Zone or Methane Buffer Zone identified by the City.[13] Therefore, no further analysis of issues related to methane are required.

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[13] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed June 4, 2015.*

Based on the analysis above, the Modified Project would not cause or accelerate geologic hazards which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. The Modified Project would not constitute a geologic hazard to other properties by causing or accelerating instability from erosion, or accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site. Finally, the Modified Project would not destroy, permanently cover, or materially and adversely modify any distinct or prominent geologic or topographic features. Therefore, based on the analysis above and through the implementation of the Project Design Feature F-1 described below, impacts related to geology and soils would be less than significant, and no mitigation measures are required. Accordingly, the Modified Project would not result in any new significant environmental impacts to geology and soils, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(a) Project Design Features

The Modified Project would implement the following Project Design Feature related to geology and soils:

PDF F-1: A final design-level geotechnical, geologic, and seismic hazard investigation report that complies with all applicable State and local code requirements shall be prepared for the Modified Project by a qualified geotechnical engineer and certified engineering geologist and shall be submitted the Los Angeles Department of Building and Safety, consistent with City of Los Angeles Building Code requirements. The site-specific geotechnical report shall be prepared to the written satisfaction of the City of Los Angeles Department of Building and Safety. The site-specific geotechnical report shall address each of the recommendations provided in the *Preliminary Geotechnical Engineering Report, Los Angeles Football Club Stadium, Los Angeles, California* (Geotechnical Report), prepared by Langan Engineering and Environmental Services, July 24, 2015, including, but not limited to the following, and as may be amended in accordance with future regulatory requirements:

- Shallow foundations bearing on alluvial soils at the proposed stadium foundation elevation or engineered fill shall be designed with an allowable bearing pressure of 6,000 pounds per square foot (psf) or 3,000 psf, respectively. An increase of 33 percent can be used for temporary or transient loading such as seismic or wind. The minimum lateral dimension of isolated footings shall not be less than 48 inches and shall be embedded at least 24 inches below surrounding grade. In order to minimize

differential settlement between the proposed Ancillary Uses and Northwest Plaza structures and the stadium structure, expansion joints shall be installed between any structural connection features.

- Should portions of the proposed structures require the additional support of deep foundation systems due to higher, concentrated compression and/or uplift loads, deep foundations shall consist of drilled piles (i.e., Cast-in-Drilled-Hole (CIDH), or Augered Cast-in-Place (ACIP)) piles) that are sized in accordance with the sizing parameters provided in Section 6.2.2 of the Geotechnical Report. A pre-construction test pile and pile load test program shall be implemented with a minimum of four (4) test piles as outlined in Section 6.2.2 of the Geotechnical Report.
- The lowest proposed floor slab shall be designed as a slab-on-grade bearing following the recommendations outlined in Section 6.3 of the Geotechnical Report.
- Below-grade walls shall be designed to resist soil and surcharge pressures using the parameters provided in Section 6.4 of the Geotechnical Report.
- Damp-proofing (such as Grace Water Shield water barrier membrane or equivalent) shall be utilized in below-grade closed areas that may house equipment, finishes, or occupants that could be adversely impacted by moisture intrusion.
- A perimeter foundation drain shall be installed to collect and route any accumulated water to the site drainage system.
- Trees with deep-rooted or widespread rooted systems or vegetation shall not be planted within 30 feet of below-grade walls.
- Utility subgrade shall be confirmed to be free of standing water, firm, and unyielding prior to placement of bedding material. Utility trenches above pipe bedding shall be backfilled in accordance with the recommendations provided in the Geotechnical Report for fill compaction requirements using either previously excavated soil (if suitable), or with approved imported material.
- After completion of excavation, including removal of all below grade remnants, stripping, grubbing, removal of asphalt, base course material, the soil subgrade shall be compacted in-place by proofrolling with at least 6 passes of a vibratory roller compactor having a minimum static drum weight of 5 tons. Any areas exhibiting rutting or pumping shall be removed and replaced with compacted engineered fill material. All fills should be selected

and placed in accordance with the placement and compaction criteria discussed in Section 7.3 of the Geotechnical Report.

- Temporary excavations shall be constructed in accordance with Cal/OSHA requirements. Temporary slopes may be excavated at a 2H:1V (horizontal to vertical). Steeper slopes may be excavated with a maximum slope of 1.5H:1V (horizontal to vertical) may be excavated where acceptable by Cal/OSHA and the inspecting Geotechnical Engineer.
- If perched groundwater is encountered during Modified Project construction, temporary construction dewatering, where required, shall be performed using conventional gravity routing and collection in sump pits, with pumping performed as needed to dispose of any water accumulated in these areas.
- All new construction work shall be performed so as not to adversely impact or cause loss of support to structures, hardscape, and landscape elements, paving, or utilities to remain. A pre-construction condition documentation comprised of photographic and videographic documentation of accessible and visible areas of neighboring landscaped, and hardscaped areas including pavements and sidewalks shall be performed prior to initiating construction activities at the Project Site and submitted to the Los Angeles Department of Building and Safety.

G. Greenhouse Gas Emissions

Since the certification of the Certified EIR in 2011, numerous regulatory changes have occurred that are pertinent to the study of greenhouse gas (GHG) impacts under CEQA. To inform the analysis of the Modified Project's potential GHG impacts, a summary of the current regulatory framework surrounding GHG emissions is included in Appendix J of this Addendum.

The Certified EIR for the Original Stadium Project concluded that impacts with respect to GHG emissions would be less than significant under the Original Stadium Project (refer to Section IV.C, Greenhouse Gas Emissions, of the Certified EIR). The thresholds on which this analysis was based are stated on pages IV.C-10–IV.C-11 of the Certified EIR. The Certified EIR's conclusion was based on the following:

- GHGs emitted during construction of the Original Stadium Project would represent a nominal percent of the State's total GHG emissions in 2008;
- The proposed stadium would be an outdoor venue which would significantly reduce the amount of stationary source GHG emissions associated with heating

and air conditioning (as compared to an indoor stadium such as the Los Angeles Memorial Sports Arena that currently exists on the Project Site);

- The Original Stadium Project would replace an existing venue that is over 50 years old with a state-of-the art venue that would result in significantly increased energy efficiencies at the Project Site; and

- The Original Stadium Project would not result in an increase in peak (i.e., event day) vehicle trips as compared to existing conditions under operation of the Sports Arena.

These characteristics also are true for the Modified Project. However, the Modified Project includes up to approximately 105,900 square feet of ancillary facility floor area (up to approximately 119,000 gross square feet) that were not part of the Original Stadium Project. Additionally, while peak day attendance under the Modified Project is expected to be within peak historic attendance levels at the Sports Arena, based on preliminary programming data provided by LAFC, annual attendance in the Modified Project's stadium could increase compared to existing conditions. These annual attendance estimates are relevant for determining the Modified Project's GHG impacts as they relate to mobile source emissions and vehicle miles traveled (VMT). Accordingly, additional analysis was conducted to determine whether the Modified Project would result in new significant impacts with respect to GHG emissions that were not previously identified in the Certified EIR. The analysis is based on VMT estimates provided by Fehr & Peers Transportation Consultants, which are included in Appendix K of this Addendum.

(a) Significance Thresholds for the Modified Project

Project-level significance thresholds for GHG emissions have not yet been adopted by the California Air Resources Board (CARB), the South Coast Air Quality Management District (SCAQMD), or the City of Los Angeles. Rather, assessing the significance of a project's contribution to cumulative global climate change involves developing an inventory of project GHG emissions and considering project consistency with applicable emission reduction strategies and goals, such as those set forth by Assembly Bill (AB) 32. Based on the foregoing, a project that generates GHG emissions, either directly or indirectly, would have a significant impact if:

- The project's reduction in emissions does not constitute an equivalent or larger break from "business-as-usual" (BAU) than has been determined by CARB to be necessary to meet the state AB 32 goals (i.e., 16 percent, as discussed below); or

- The project conflicts with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

An illustrative method to determine consistency with AB 32 that has the benefit of being based on a quantification of emissions is to compare a project's emissions, as proposed, to that project's emissions if it were to be built using BAU design, methodology, and technology. If a project constitutes an equivalent or larger break from BAU than has been determined by CARB to be necessary to meet AB 32's goals for 2020 (approximately 16 percent, as established in CARB's *Supplemental FED to the Climate Change Scoping Plan*),[14] then that project can be considered consistent with AB 32. As such, the project is considered to have a less-than-significant impact on the environment due to its GHG emissions. While not project-specific, 16 percent is considered the average level of emissions reduction performance that would need to be achieved across all sectors of the economy to meet AB 32 goals (i.e., applied to both new and existing GHG emissions sources). The following analysis uses this "break from BAU" method to determine the Modified Project's consistency with AB 32. This approach also mirrors the concepts used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32.[15]

Consistent with CARB and SCAQMD guidance for defining BAU,[16] this analysis provides a quantitative estimate of the following GHG emissions inventories:

- Baseline—This scenario consists of historic operations at the Sports Arena at the time of the Certified EIR.

- BAU—This scenario consists of the Modified Project's land uses and program assuming compliance with State mandates that were accounted for in the *Supplemental FED to the Climate Change Scoping Plan* (i.e., 2008 Title 24), and with a minimal trip reduction credit taken for transit accessibility.[17]

- Modified Project As Proposed—This scenario consists of the Modified Project assuming compliance with current State mandates and Project Design Features (described in Section IV.G.b.ii on page 80), and with a 15-percent trip-reduction credit taken, based on the current transit services available at the Project Site,

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[14] *CARB, Supplement to the AB 32 Scoping Plan FED, Table 1.2-2, Updated 2020 Business-as-Usual Emissions Forecast, www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf.*

[15] *The Scoping Plan defines "business-as-usual" as emissions in the absence of greenhouse gas reduction measures (i.e., the 2020 "business-as-usual" emissions inventory was forecast based on the 2002 to 2004 statewide average annual emissions and does not take credit for, inter alia, reduction from 2005 Title 24, Assembly Bill 1493 greenhouse gas emissions reduction standards for vehicles, the California Low Carbon Fuel Standard, or full implementation of the Renewables Portfolio Standard).*

[16] *SCAQMD, Draft Guidance Document-Interim CEQA GHG Significance Threshold, Attachment E, October 2008.*

[17] *See Fehr & Peers, Draft Memorandum, Vehicle Miles Traveled Analysis for the Los Angeles Football Club Stadium Project, August 17, 2015, included in Appendix K of this Addendum.*

which include the Exposition Line Light Rail transit line, which was planned but not yet operational at the time the Certified EIR was prepared, as discussed in the Certified EIR.[18]

Furthermore, the CEQA Guidelines were subsequently amended after certification of the Certified EIR to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.[19]

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions." Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with a plan, program, or regulation that will reduce GHG emissions.[2021]

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[18] *Ibid.*

[19] *Note that "the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis." Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources (April 13, 2009) (regarding Senate Bill 97 amendments to CEQA Guidelines)*

[20] *See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…." Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$/year significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See, SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014) (available at www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2); SCAQMD, Final Negative Declaration for: Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (available at www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for: Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014) (available at www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2);*

(Footnote continued on next page)

Consistent with CEQA Guidelines Section 15064(h)(3), this analysis also provides a qualitative estimate of the Modified Project's compliance with plans, programs, and regulations that reduce a project's GHG emissions either directly or indirectly, including: the California Green Building Standards Code; the Southern California Associations of Governments' (SCAG) 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS); the City of Los Angeles Green Building Code (2013); and *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming*. In addition, this analysis provides a qualitative assessment of the Modified Project's compliance with the California Cap-and-Trade Program and applicable executive orders related to climate change. See also Sections IV.C., Air Quality; IV.J, Land Use and Planning; and IV.P, Utilities and Service Systems, of this Addendum for additional relevant analyses of the Modified Project's consistency with other regulatory plans and policies that are pertinent to the general concepts of "smart growth," environmental sustainability, and the efficient use of resources.

(b) Modified Project Impacts

(i) Consistency with AB 32

GHG emissions associated with the three scenarios described above in Section IV.G.a on page 76 of this Addendum, (i.e., Baseline, BAU, and Modified Project as Proposed) were calculated using CalEEMod, the model recommended by the SCAQMD for calculating emissions from land use projects. Model results are provided in Appendix I of this Addendum. As summarized and shown in Table 9 on page 80, the Modified Project would result in an increase in annual GHG emissions in comparison to operation of the existing Sports Arena due to the increase in annual attendance at the Modified Project's stadium, as well as the daily operation of the proposed Ancillary Uses. However, with implementation of the Project Design Features described below, as well as current State mandates, the Modified Project would result in an annual total of approximately 12,496 metric tons of carbon dioxide equivalent (CO_2e), representing an approximate 25 percent reduction from the BAU scenario. Thus, the Modified Project would result in a net decrease in GHG emissions that represents a substantial break from BAU (i.e., greater than 16 percent). Additionally, the Modified Project's features and GHG reduction

Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2015) (available at www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2).

[21] *CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program (17 CCR §§ 95800 to 96023) is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020.*

Table 9
Annual GHG Emissions Summary
(Metric Tons of Carbon Dioxide Equivalent)

Scope	Baseline (Sports Arena)	BAU Project	Modified Project as Proposed[a]	Modified Project's Break from BAU
Area	<1	<1	<1	0%
Energy	2,700	2,476	2,154	-13%
Mobile	2,846	13,862	10,004	-28%
Waste	2	127	76	-40%
Water	30	132	113	-15%
Construction	0	149	149	0%
Total	**5,578**	**16,746**	**12,496**	**-25%**

BAU = Business As Usual

[a] *The difference between the Modified Project as Proposed against the Baseline (Sports Arena) is also less than the SCAQMD's significance threshold of 10,000 metric tons of Carbon Dioxide Equivalent for stationary source projects where SCAQMD is the lead agency (i.e., 12,496 CO_2e – 5,578 CO_2e = 6,918 CO_2e).*

Source: Eyestone Environmental, 2015. Calculation worksheets are included in Appendix I of this Addendum.

measures described below make it consistent with AB 32. Therefore, impacts with respect to AB 32 consistency and the Modified Project's break from BAU would be less than significant. No mitigation measures are required.

(ii) Consistency with Plans, Programs, and Regulations for Reducing GHG Emissions

The Modified Project would incorporate sustainability as part of its key design and would serve to reduce GHG emissions in comparison to BAU. In so doing, the Modified Project would comply with Title 24 of the California Code of Regulations, including Part 6 (Energy Efficiency Standards for Residential and Nonresidential Buildings) and Part 11 (California Green Building Standards Code, commonly referred to as the CALGreen Code), as well as the City of Los Angeles Green Building Code (2013), which incorporates the CALGreen Code into Chapter IX of the Los Angeles Municipal Code (LAMC). The 2013 CALGreen Code (applicable to the Modified Project) is anticipated to be 30 percent more efficient than the 2008 Title 24 (applicable to the Original Stadium Project and BAU) for

nonresidential construction.[22] In accordance with Project Design Feature G-2, energy efficiency would be achieved through building design and through the incorporation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems, lighting, and appliances.

In accordance with Project Design Feature G-1, the Modified Project would also be designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's LEED-BD+C or LEED-ND Rating System (v.3), or equivalent green building standards. Achieving LEED Silver would reduce energy consumption associated with lighting by a minimum of 20 percent in comparison to BAU. As discussed in Section IV.P, Utilities and Service Systems, on page 171, the Modified Project would also implement numerous water conservation measures in accordance with LADWP requirements for new development in the City of Los Angeles (e.g., high-efficiency fixtures and appliances, weather-based irrigation systems, drought-tolerant landscaping). See Project Design Feature P-1 and EIR Mitigation Measure MM I.2-1 in Section IV.P.b, Utilities and Service Systems—Water, on page 176. Furthermore, as described in Section IV.P.c, Utilities and Service Systems—Solid Waste, of this Addendum, Mitigation Measure MM I.4-2 from the Certified EIR (as revised) states that the Applicant shall demonstrate through annual compliance reports submitted to the City of Los Angeles Department of Public Works, Bureau of Sanitation, an annual operational diversion rate of at least 40 percent. Additionally, pursuant to Mitigation Measure MM I.4-2 from the Certified EIR (as revised), the Modified Project would divert a minimum of 75 percent of construction related solid waste and demolition debris from area landfills. Additionally, Modified Project construction materials would utilize post-consumer recycled content pursuant to Project Design Feature P-2. Pursuant to Project Design Feature P-3, during operation, the Modified Project would implement a composting program and would utilize bio-based materials. Each of these features would help to further reduce GHG emissions by reducing the amount of energy that would have otherwise been consumed to extract and process virgin source materials. The Modified Project also includes numerous energy reduction features as set forth in Section IV.P.d, Utilities and Service Systems—Energy, on page 195. See Project Design Features P-4 and P-5 and EIR Mitigation Measures MM I.3-1 through MM I.3-19. Such features include the use of energy efficient appliances, building materials, and heating and cooling systems.

As discussed in Section IV.J, Land Use and Planning, on page 101 of this Addendum, SCAG's 2012–2035 RTP/SCS, adopted in April 2012, presents a long-term

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[22] *California Energy Commission, Energy Commission Approves More Efficient Buildings for California's Future, May 31, 2012, www.energy.ca.gov/releases/2012_releases/2012-05-31_energy_commission_approves_more_efficient_buildings_nr.html, accessed August 10, 2015.*

transportation vision through the year 2035 for its six county region. The mission of the 2012–2035 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians."[23] The 2012–2035 RTP/SCS emphasizes sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. In so doing, the 2012–2035 RTP/SCS provides goals and policies that are inherently related to the reduction of GHG emissions.

The 2012–2035 RTP/SCS establishes High-Quality Transit Areas, which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[24] Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas. The Project Site is located within a High-Quality Transit Area as designated by the 2012–2035 RTP/SCS.[25] Furthermore, the Modified Project is designed with a mix of land uses (e.g., stadium, retail, office, and restaurants) that would capture internal vehicular trips at the Project Site, thereby reducing VMT. The Project Site is also located on a previously developed urban site where substantial existing infrastructure is in place. In accordance with Project Design Feature G-3, the Modified Project would include numerous features to reduce vehicular traffic, including preferential parking for alternative-fueled vehicles and carpools, encouraging the use of mass transit, and encouraging pedestrian and bicycling as viable means of accessing the Project Site by employees and visitors. Specifically, with regard to preferential parking for alternative-fueled vehicles, ten percent of the parking spaces provided in the Modified Project's VIP parking lot on the Project Site would be constructed to accommodate the future placement of facilities for the recharging of electric vehicles pursuant to Project Design Feature G-3. These measures would reduce vehicle miles traveled and usage of petroleum based fuels. The Project Site location provides convenient pedestrian access to several stops on the Exposition Line Light Rail Line, including the Expo Park/USC Station (0.35 mile from the Project Site) and the Expo/Vermont Station (0.7 mile from the Project Site), as well as the 37th Street/USC Silver Line Bus Rapid Transit (BRT) Station on the Harbor Transitway (located approximately 0.37 mile from the Project Site). The Project Site is also served by seven bus lines operated by Metro and the Los Angeles Department of Transportation (LADOT) within 0.25 mile of the Project Site. The availability and accessibility of public transit in the Project area is evidenced by the Project Site's location within a designated High-Quality

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[23] *SCAG 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy, pp. viii, available at http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx, accessed August 13, 2015.*

[24] *Ibid, pp. 114.*

[25] *Ibid, Exhibit 4.9: High-Quality Transit Areas (HQTA) SCAG Region, pp. 136.*

Transit Area. By focusing new development within a designated High-Quality Transit Area, the Modified Project would be consistent with regional growth strategies promoted in the 2012–2035 RTP/SCS, which represent widely recognized "smart growth" planning strategies that promote higher density, infill development with access to public transit in an effort to reduce urban sprawl and its associated environmental effects. Overall, and as discussed further in Section IV.J, Land Use and Planning, on page 101 of this Addendum, the Modified Project would be consistent with the 2012–2035 RTP/SCS, which is a relevant regional plan adopted for the purpose of reducing GHG emissions.

California's Cap-and-Trade Program

The *Climate Change Scoping Plan* identifies a cap-and-trade program as one of the strategies for California to reduce GHG emissions. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020 and ultimately achieving an 80-percent reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit.

Under the approved Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period[26] and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits. The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. As summarized by CARB in the First Update:

> *The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their*

[26] *A "compliance period" is the time frame during which the compliance obligation is calculated. The years 2013 and 2014 are the first compliance period, the years 2015–2017 are the second compliance period, and the third compliance period is from 2018–2020.*

> *GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.*[27]

In other words, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions.[28] If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate:

> *The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap.*[29] *[…]*
>
> *[T]he Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions.*[30]

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[27] *CARB. First Update to the Climate Change Scoping Plan: Building on the Framework at 86 (May 2014) (emphasis added).*

[28] *Id.*

[29] *Id., at p. 88.*

[30] *Id., at pp. 86–87. See also CARB's 2013 Annual Compliance Obligation of the Cap-and-Trade Program reported 100 percent compliance for entities subject to the program, www.arb.ca.gov/cc/capandtrade/2013compliancereport.xlsx.*

In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory architecture adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures. As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California whether generated in-state or imported.[31] Accordingly, GHG emissions associated with CEQA projects' electricity usage would be capped in the aggregate and steadily reduced by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period.[32] While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015.[33]

The Cap-and-Trade Program covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle-miles traveled (VMT) would be capped in the aggregate and steadily reduced by the Cap-and-Trade Program.

As demonstrated above, GHG emissions attributable to electricity use and VMT, as well as stationary source GHG emissions, would be reduced by the Cap-and-Trade Program. As such, these GHG emissions are reduced by an existing regulatory scheme designed to address the cumulative problem of climate change. Accordingly, the Modified Project's GHG emissions in these categories, which are reduced by the Cap-and-Trade Program, would not be considered cumulatively considerable per the guidance provided in CEQA Guidelines Section 15064(h)(3).

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[31] *17 CCR § 95811(b).*

[32] *17 CCR §§ 95811 and 95812(d).*

[33] *Id., at § 95851(b) (emphasis added).*

Executive Orders S-3-05 and B-30-15

At the state level, Executive Orders S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). As analyzed above, the Modified Project is consistent with AB 32. Therefore, the Modified Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. These goals have not been codified.[34] However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its *Climate Change Scoping Plan*, CARB acknowledged that the "measures needed to meet the 2050 target are too far in the future to define in detail."[35] In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."[36] Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantitatively analyzing the Modified Project's impacts further relative to the 2030 and 2050 goals is speculative for purposes of CEQA.[37] Moreover, CARB has not calculated and released the BAU emissions projections for 2030 or 2050, which are necessary data points for quantitatively analyzing a CEQA project's consistency with these targets.

Although the Modified Project's emissions levels in 2030 and 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the proposed Modified Project's emissions level to

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[34] *Senate Bill (SB) 32, which currently is being considered by the State Assembly, would codify Governor Schwarzenegger's Executive Order S-3-05 goal of cutting GHG emissions to 80 percent below 1990 levels by 2050. In addition, on June 1, 2015, the California Senate amended SB 32 to also codify the interim goal set forth in Executive Order B-30-15 for GHG emissions levels to be 40 percent below 1990 levels by 2030, and to authorize CARB to adopt an additional interim GHG emissions level target for 2040.*

[35] *CARB, Scoping Plan, p. 117, December 2008.*

[36] *CARB, First Update, p. 32, May 2014. Website www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf, accessed March 2, 2015.*

[37] *See 14 Cal. Code Regs § 15145 ("If, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.").*

decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Modified Project's emissions total at build-out presented in Table 9 on page 80, represents the maximum emissions inventory for the Modified Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Modified Project emissions once fully constructed and operational, the Modified Project is considered to be consistent with the Executive Orders.

The *Climate Change Scoping Plan* recognizes that AB 32 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target: "These [greenhouse gas emission reduction] measures also put the state on a path to meet the long-term 2050 goal of reducing California's greenhouse gas emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate."[38] Also, CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the proposed Modified Project's post-2020 emissions level to the extent applicable by law:[39,40] These emission reduction strategies include the following:

- **Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the proposed Modified Project's emissions levels.[41] Additionally, further additions to California's renewable resource portfolio would favorably influence the proposed Modified Project's emissions levels.[42]

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing

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[38] *Climate Change Scoping Plan at 15.*

[39] *CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]*

[40] *CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94–99, May 2014.*

[41] *CARB, First Update, pp. 37–39, 85, May 2014.*

[42] *CARB, First Update, pp. 40–41, May 2014.*

transportation systems all will serve to reduce the proposed Modified Project's emissions levels.[43]

- **Water Sector:** The proposed Modified Project's emissions levels will be reduced as a result of further desired enhancements to water conservation technologies.[44]

- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the proposed Modified Project's emissions levels.[45]

The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. Although the Cap-and-Trade Program would remain in effect in post-2020, it is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.[46] However, CARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."[47] The "expected completion date" for this recommended action is 2017.[48]

In addition to CARB's First Update, in January 2015, during his inaugural address, Governor Jerry Brown expressed a commitment to achieve "three ambitious goals" that he would like to see accomplished by 2030 to reduce the State's GHG emissions: (1) increasing the State's Renewable Portfolio Standard from 33 percent in 2020 to 50 percent in 2030; (2) cutting the petroleum use in cars and trucks in half; and (3) doubling the efficiency of existing buildings and making heating fuels cleaner.[49] These expressions of Executive Branch policy may be manifested in adopted legislative or regulatory action

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[43] *CARB, First Update, pp. 55–56, May 2014.*

[44] *CARB, First Update, p. 65, May 2014.*

[45] *CARB, First Update, p. 69, May 2014.*

[46] *But see AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.*

[47] *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).*

[48] *Id.*

[49] *Transcript: Governor Jerry Brown's January 5, 2015, Inaugural Address, www.latimes.com/local/political/la-me-pc-brown-speech-text-20150105-story.html#page=1, accessed March 2, 2015.*

through the state agencies and departments responsible for achieving the State's environmental policy objectives, particularly those relating to global climate change.

Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050.[50] Even though these studies do not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target.

Given the proportional contribution of mobile source-related GHG emissions to the State's inventory, recent studies also show that relatively new trends, such as the increasing importance of web-based shopping, the emergence of different driving patterns by the "millennial" generation and the increasing effect of Web-based applications on transportation choices, are beginning to substantially influence transportation choices and the energy used by transportation modes. These factors have changed the direction of transportation trends in recent years, and will require the creation of new models to effectively analyze future transportation patterns and the corresponding effect on GHG emissions. Therefore, the Modified Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets.

(iii) Conclusion

Given the Modified Project's consistency with State, regional, and local GHG emission reduction goals and objectives, the Modified Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, as was the case with the Original Stadium Project. Furthermore, the Modified Project would comply with plans, programs, and regulations that reduce GHG

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[50] *Energy and Environmental Economics (E3), "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80% below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.*

emissions. Indeed, many Modified Project-related emissions would be capped in the aggregate and steadily reduced by the Cap-and-Trade Program, such as energy, mobile, and construction emissions. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, impacts with respect to GHG emissions under the Modified Project would be less than significant and not cumulatively considerable. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to GHG emissions, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(c) Project Design Features

The Modified Project would implement the following Project Design Features related to GHG emissions:

PDF G-1: The Modified Project shall be designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-BD+C or LEED-ND Rating System (v.3), or equivalent green building standards.

PDF G-2: The Modified Project shall comply with the required measures of the 2013 Los Angeles Green Building Code and shall implement additional efficiency measures to achieve a reduction in energy consumption that is greater than 25 percent relative to the ASHRAE 90.1-2007 standard, but no less than minimum compliance with the 2013 California energy efficiency standards (Title 24, Part 6). Energy efficiency shall be achieved through building design and through the incorporation of energy-efficient heating, ventilation, and air conditioning (HVAC) systems, lighting, and appliances.

PDF G-3: The Modified Project shall include the following measures to promote the use of alternative modes of travel and reduce vehicle miles traveled:

- Transit accessibility improvements to facilitate transit use (e.g., wayfinding signage, walkways, etc.)
- Ten percent of the parking spaces provided in the Modified Project's VIP parking lot on the Project Site shall be constructed to accommodate the future placement of facilities for the recharging of electric vehicles
- Reduced price Metro transit passes for project employees
- Printed transit information on tickets

In addition, refer to the Project Design Features and Mitigation Measures in Section IV.P, Utilities and Service Systems, on page 171 of this Addendum, which would indirectly reduce GHG emissions by reducing the Modified Project's resource consumption and waste generation.

H. Hazards and Hazardous Materials

The Certified EIR for the Original Stadium Project concluded that impacts with respect to hazards and hazardous materials would be less than significant under the Original Stadium Project through compliance with applicable regulatory requirements (refer to Section V, General Impact Categories, of the Certified EIR). Significant impacts with respect to hazards and hazardous materials could occur if a project were to expose people or structures to substantial risk resulting from the release of a hazardous material, or from exposure to a health hazard, in excess of regulatory standards. The Certified EIR analyzed the demolition of the existing Sports Arena and stated that there is a potential for the Sports Arena to contain asbestos containing materials (ACMs) and lead. Subsequent to the preparation of the Certified EIR, an ACM Survey was conducted for the Sports Arena in January 2012 (see Appendix L of this Addendum), which confirmed that ACMs are present in some ceiling materials, roofing materials, ceiling tiles, floor tiles and mastic, and insulation.

As stated in the Certified EIR, on-site ACMs must be removed by licensed contractors using specific control methods prescribed in SCAQMD Rule 1403, which would ensure that impacts related to ACMs would be less than significant. As with the Original Stadium Project, construction of the Modified Project would involve demolition of the Sports Arena and compliance with SCAQMD Rule 1403, which would ensure impacts would be less than significant for the Modified Project. With regard to lead-based paint, prior to issuance of a demolition permit, the Applicant would be required to submit verification to the City of Los Angeles Department of Building and Safety that a lead-based paint survey has been conducted for the Sports Arena. If lead-based paint is found, the Applicant must comply with all procedural requirements and regulations for proper lead removal and disposal, which would ensure that impacts related to lead-based paint would be less than significant. Construction of the Modified Project would conform to these requirements. Furthermore, similar to the Original Stadium Project, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners could be used, handled, and stored on the Project Site during construction of the Modified Project. Like with the Original Stadium Project, all potentially hazardous materials associated with construction of the Modified Project would be used and stored in accordance with applicable regulatory requirements and manufacturers' instructions. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), impacts with

respect to handling ACM, lead-based paint, and hazardous materials during construction would be less than significant under the Modified Project through compliance with existing regulatory requirements. No mitigation measures are required.

The Certified EIR also analyzed potential impacts related to hazards and hazardous materials during operation of the Original Stadium Project. As stated therein, minor amounts of hazardous materials such as motor oil, paints, solvents, pesticides, herbicides and fertilizers may be used at the Project Site. However, the use and disposal of such materials would be in compliance with the State Health and Safety Code, the LAMC, and the Uniform Fire Code (UFC). Therefore, the Certified EIR concluded that operation of the Original Stadium Project would not result is any significant impacts associated with hazards or hazardous materials. The general use of the stadium and the types and quantities of hazardous materials that could be used and stored in association with stadium operations would not change with the design and use modifications proposed under the Modified Project. The Modified Project also would provide Ancillary Uses to the proposed stadium analyzed in the Certified EIR, including office and conference facilities, a museum, and retail and restaurant uses. These types of land uses are not typically associated with the use and handling of substantially hazardous materials. Rather, the types and quantities of hazardous materials that could be used during operation of the Ancillary Uses would be similar to those analyzed in the Certified EIR (e.g., motor oil, paints, solvents, pesticides, herbicides and fertilizers), and would be characteristic of typical commercial land uses. Furthermore, consistent with the Certified EIR's analysis, all potentially hazardous materials associated with operation of the Modified Project would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), impacts with respect to the use, handling, and storage of hazardous materials would be less than significant under the Modified Project through compliance with existing regulatory requirements. No mitigation measures are required.

Subsequent to the preparation of the Certified EIR, a Phase I Environmental Site Assessment (Phase I ESA) dated August 26, 2015 was conducted for the Project Site. The Phase I ESA is included in Appendix M of this Addendum. To identify potential on-site hazards, the Phase I ESA included interviews with property owner representatives, a review of environmental records, a site reconnaissance, historical reviews, and interviews with public agency personnel. The Phase I ESA identified the following environmental concerns on the Project Site:

- Various containers of paint, oil, coolant, gasoline, and propane, as well as batteries and tires, that would be removed and disposed of in conjunction with demolition activities;

- Exterior evaporate Chillers that contain ACMs (not previously identified in the ACM Survey discussed above) located north of the VIP Parking Lot;

- Leaking piping containing glycol located underneath the Sports Arena floor; and

- The potential presence of a historical gasoline tank on the Project Site related to development prior to construction of the Sports Arena. No records were found related to the potential gasoline tank; therefore, it is unknown if it was an above-ground storage tank (AST) or underground storage tank (UST). According to the Phase I ESA, the approximate location of the tank was near the southern boundary line of the Project Site.

No significant stains or spills were observed in the areas where hazardous materials are stored on-site, and all materials appeared to be property stored and maintained. During demolition activities under the Modified Project, hazardous materials on the Project Site would be handled, transported, and disposed of in accordance with manufacturers' instructions and applicable federal, state, and local regulations. The Chillers, glycol, and glycol-related materials would also be removed and disposed of in accordance with applicable regulations. As stated above, on-site ACMs must be removed by licensed contractors using specific control methods prescribed in SCAQMD Rule 1403, which would ensure that impacts related to ACMs would be less than significant. With regard to the potential historical gasoline storage tank on-site, the Phase I ESA recommended that a geophysical survey be conducted to further evaluate the area for a possible tank excavation. Accordingly, Mitigation Measures MP-H-1 and MP-H-2[51] are recommended below. Mitigation Measures MP-H-1 and MP-H-2 have been incorporated into the Modified Project's MMP included as Appendix A to this Addendum. With the implementation of these measures, the Modified Project's potential impacts with respect to hazards and hazardous materials would be less than significant. Additionally, the Project Site is not within a Methane Zone or Methane Buffer Zone identified by the City,[52] so no further analysis of issues related to methane are required.

Based on the above, with implementation of Mitigation Measures MP-H-1 and MP-H-2, the Modified Project would not result in any new significant impacts with respect to

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[51] *New mitigation measures that are recommended for the Modified Project in this Addendum are noted with the prefix "MP."*

[52] *City of Los Angeles Department of City Planning, Zone Information and Map Access System (ZIMAS), Parcel Profile Report, http://zimas.lacity.org/, accessed June 4, 2015.*

hazards and hazardous materials, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(a) Mitigation Measures

The Modified Project would implement the following Mitigation Measures to mitigate potential impacts to hazards and hazardous materials to a less-than-significant level:

Mitigation Measure MP-H-1: Prior to the issuance of a demolition permit, a geophysical survey shall be prepared in the area of the identified potential historical gasoline tank (i.e., near the southern boundary line of the Project Site). If a storage tank is identified during the geophysical survey or uncovered during subsequent construction and/or demolition activities, the tank shall be removed (abandoned) in accordance with applicable federal, state, and local laws, to the satisfaction of the California Department of Conservation Division of Oil, Gas, and Geothermal Resources (DOGGR), the South Coast Air Quality Management District (SCAQMD), the Los Angeles Regional Water Quality Control Board (RWQCB), and/or the City of Los Angeles Fire Department (LAFD), as applicable. Soil sampling of the tank excavation site shall be completed by personnel appropriately trained in accordance with the Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response Standard (HAZWOPER). If contamination is detected above acceptable regulatory levels, remediation activities shall be conducted. The remediation could consist of excavation and disposal of impacted soil; in-situ treatment; and/or vapor extraction. If necessary, remedial efforts shall be conducted under the oversight of regulatory agencies including, but not limited to, the Department of Toxic Substances Control (DTSC); the LAFD; and the RWQCB.

Mitigation Measure MP-H-2: If soil contamination is identified during the soil sampling procedures outlined in Mitigation Measure MP-H-1, prior to issuance of a permit(s) for activities involving construction dewatering, evidence shall be provided to the Los Angeles Department of Building and Safety that a valid National Pollutant Discharge Elimination System (NPDES) or Industrial Waste Discharge Permit is in place. The NPDES or Industrial Waste Discharge Permit shall include provisions for evaluating the groundwater for potential contamination and, if necessary, the need for treatment of dewatering discharge.

I. Hydrology and Water Quality

The following analysis is based on the Hydrology and Water Quality analysis provided in Section IV.E of the Certified EIR, and on the Hydrology and Water Quality Technical Memorandum (Hydrology Report) prepared for the Modified Project by Langan Engineering and Environmental Services, dated September 2, 2015, which is included in Appendix N of this Addendum. The Hydrology Report identifies potential surface water and groundwater hydrology and water quality impacts that may be associated with the Modified Project and determines whether the Modified Project would result in new significant impacts not previously identified in the Certified EIR.

(a) Construction

The Certified EIR for the Original Stadium Project concluded that impacts with respect to hydrology and water quality would be less than significant during construction of the Original Stadium Project through compliance with applicable regulatory requirements (refer to Section IV.E, Hydrology and Water Quality, of the Certified EIR). Mitigation Measures E-1 and E-3 are included in the Certified EIR to further ensure implementation of the applicable regulatory requirements that support this conclusion (i.e., compliance with a SWPPP and NPDES waste discharge requirements, respectively). The thresholds on which this analysis was based are stated on pages IV.E-8–IV.E-9 of the Certified EIR.

With regard to surface water hydrology and water quality impacts during construction, the Original Stadium Project was required to prepare and implement a SWPPP, as reflected in Mitigation Measure E-1 in the Certified EIR. The SWPPP would be prepared and implemented in compliance with the Construction General Permit administered by the State Water Resources Control Board (SWRCB).[53] The SWPPP would include temporary controls, or BMPs, to address construction impacts to hydrology and water quality, particularly during soil disturbing activities when soils are exposed to wind, rain, and concentrated flows that cause erosion, and that would minimize the transmission of sediment into the storm drain system. The SWPPP control measures would be designed to convey the 25-yr and 50-yr rainfall events from the Project Site. Additionally, the SWPPP would also address proper usage and storage of common construction materials such as vehicle fluids (e.g., oil, grease, etc.), asphalt concrete and Portland cement concrete, paints, solvents and thinners, metals and plated products and fertilizers. Finally, the SWPPP would address construction related waste such as wastewater from vehicle cleaning operations, trash from material packaging, employee's

[53] *Construction General Permit Water Quality Order 2009-0009-DWQ as amended by Order No. 2012-0006-DWQ.*

meal breaks, slurries from sawing and grinding operations, wastewater/waste from concrete washout operations and sanitary waste. The Certified EIR concluded that following the implementation of Mitigation Measure E-1, which requires implementation of a SWPPP, impacts to surface water hydrology and water quality during construction would be less than significant under the Original Stadium Project.

Construction activities under the Modified Project would be substantially similar to those of the Original Stadium Project in terms of the amount of ground disturbance and the types of pollutants that could be introduced to the Project Site. As is the case for the Original Stadium Project, potential impacts to surface water quality and hydrology would be mitigated to a less-than-significant level through preparation and implementation of a SWPPP. Mitigation Measure E-1 from the Certified EIR has been incorporated into the Modified Project's MMP included as Appendix A to this Addendum. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.E, Hydrology and Water Quality, of the Certified EIR), construction-related impacts with respect to surface water hydrology and water quality under the Modified Project would be less than significant through implementation of a SWPPP prepared to the satisfaction of LADBS, as reflected in Mitigation Measure E-1 of the Certified EIR. No additional mitigation measures are required.

As it relates to impacts to groundwater during construction, the Certified EIR stated that the Project Site is not an area that provides substantial groundwater recharge. Furthermore, the project contractor would be required to comply with existing regulatory requirements pertaining to water quality that would ensure that the Original Stadium Project would not result in any significant impacts to groundwater. Such requirements include the preparation and implementation of a SWPPP as reflected in Mitigation Measure E-1 in the Certified EIR, and compliance with NPDES waste discharge requirements for construction dewatering, which is reflected in Mitigation Measure E-3 in the Certified EIR. Therefore, the Certified EIR concluded that the Original Stadium Project would not adversely affect groundwater conditions with implementation of the aforementioned mitigation measures.

As discussed in the Hydrology Report, and consistent with the analysis in the Certified EIR, appreciable groundwater recharge does not occur on the Project Site. Furthermore, as discussed above, the Modified Project's SWPPP would include BMPs for the proper handling, storage, and disposal of hazardous materials during construction to avoid subsurface contamination. With regard to the potential for encountering groundwater during construction, as discussed in the Hydrology Report, the proposed stadium under the Modified Project would be constructed within a portion of the excavation and footprint area currently occupied by the Sports Arena, consistent with the Original Stadium Project. The

basement level of the Sports Arena currently extends to a depth of approximately 25 feet below grade level (approximately el 155).[54] The excavation areas following removal of the Sports Arena not occupied by the proposed stadium footprint would be backfilled to existing grade. As discussed above in Section IV.F, Geology and Soils, of this Addendum (see page 69), based on the information provided in the Geotechnical Report, the excavation required for the proposed development would not extend deeper than the current below-grade areas of the Sports Arena. Both historical groundwater levels and recently monitored groundwater levels are well below the lowest proposed grade of the Modified Project (refer to Section IV.F, Geology and Soils, on page 69). Therefore, it is not expected that groundwater would be encountered during construction of the Modified Project. Nonetheless, the potential exists for shallower, perched water to be encountered at the Project Site depending on seasonal rainfall. Therefore, while not anticipated, temporary construction dewatering may be required. Construction dewatering, if required, would be performed using conventional gravity routing and collection in sump pits, with pumping performed as needed to dispose of any water accumulated in these areas, in accordance with Project Design Feature F-1 in Section IV.F, Geology and Soils. Additionally, Mitigation Measure E-3 from the Certified EIR has been incorporated into the Modified Project's MMP included as Appendix A to this Addendum, which requires that construction dewatering comply with applicable NPDES permit requirements. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.E, Hydrology and Water Quality, of the Certified EIR), construction-related impacts with respect to groundwater under the Modified Project would be less than significant through compliance with Mitigation Measures E-1 and E-3 of the Certified EIR. No additional mitigation measures are required.

Based on the analysis above, through the implementation of mitigation measures identified in the Certified EIR, construction of the Modified Project would not result in any new significant impacts with respect to hydrology and water quality, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(b) Operation

The Certified EIR for the Original Stadium Project concluded that impacts with respect to hydrology and water quality would be less than significant during operation of the Original Stadium Project through compliance with applicable regulatory requirements (refer to Section IV.E, Hydrology and Water Quality, of the Certified EIR). Mitigation Measure E-2 is included in the Certified EIR to further ensure implementation of the applicable regulatory

[54] *With respect to NAVD.*

requirements that support this conclusion (i.e., compliance with Standard Urban Stormwater Mitigation Plan (SUSMP) requirements). The thresholds on which this analysis was based are stated on pages IV.E-8–IV.E-9 of the Certified EIR.

With regard to surface water quality, the Certified EIR stated that the Original Stadium Project would have the potential to introduce additional contaminants that could impact the urban runoff flows on the Project Site, such as petroleum products, paints and solvents, detergents, fertilizers, and pesticides. As reflected in Mitigation Measure E-2 in the Certified EIR, the Original Stadium Project would be required to prepare and implement a SUSMP in accordance with the Los Angeles County RWQCB MS4 Program, which would reduce surface water quality impacts to a less-than-significant level. The Modified Project would introduce similar types of pollutants to the Project Site as the Original Stadium Project. As is typical of commercial developments with restaurant uses, anticipated pollutants would include pathogens, nutrients, pesticides, sediments, trash and debris, oxygen demanding substances and oil and grease. Like the Original Stadium Project, the Modified Project would be subject to Mitigation Measure E-2 in the Certified EIR and would be required to prepare and implement a SUSMP with permanent on-site BMPs to reduce the quantity and improve the quality of rainfall runoff from the Project Site. Additionally, the Modified Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ord. No. 181899), which expanded the applicability of SUSMP requirements by imposing rainwater LID strategies on projects that require building permits. The LID Ordinance was adopted in November 2011 and officially became effective on May 12, 2012.[55] LID consists of site design approaches and BMPs that are designed to address runoff and pollution at the source. The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. The LID ordinance requires rainwater from a 0.75-inch rainstorm to be captured, infiltrated, and/or used on-site at most developments and redevelopments where more than 500 square feet of hardscape is added. In so doing, the City's LID Manual prioritizes the following BMPs: infiltration systems, stormwater capture and use, high efficient biofiltration/bioretention systems, or a combination of the above. The Modified Project would incorporate one or more of these BMPs to achieve compliance with LID Ordinance requirements. Because runoff from the Project Site is currently untreated, implementation of the Modified Project would result in a beneficial impact with regard to surface water quality as compared to existing conditions. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.E, Hydrology and Water Quality, of the Certified EIR), operational impacts with respect to surface water quality under the Modified Project would be less than significant (and in fact

[55] *LA Stormwater, Low Impact Development (LID) 2-Sided Brochure, www.lastormwater.org/wp-content/files_mf/lidbrochure4.19.12.pdf, accessed May 2, 2014.*

beneficial) through implementation of applicable regulatory requirements, including compliance with a SUSMP prepared to the satisfaction of LADBS, as reflected in Mitigation Measure E-2 of the Certified EIR, and the City's LID Ordinance. Mitigation Measure E-2 has been incorporated into the Modified Project's MMP included as Appendix A to this Addendum. No additional mitigation measures are required.

With regard to surface water hydrology, as stated in the Certified EIR, the Project Site in its existing state is mostly impervious. Stormwater that is not absorbed in the pervious areas is collected as runoff and is conveyed via sheet flow to the City storm drainage systems in Hoover Street and Martin Luther King, Jr. Boulevard. The Sports Arena roof, the eastern depressed areas, and some structured areas collect stormwater runoff into a building drainage system and utilize pumps to convey the stormwater to the existing surface drainage system. The Certified EIR concluded that permeable areas would slightly increase as compared to the existing conditions under the Original Stadium Project, thereby improving runoff conditions by reducing the flow to the storm drain system. Therefore, because stormwater runoff conditions would be improved compared to existing conditions, the Certified EIR determined that surface water hydrology impacts under the Original Stadium Project would be less than significant. The Hydrology Report analyzes post-development stormwater flows based on the Modified Project design. The amount of impervious surface area on-site would be approximately the same under the Modified Project as compared to existing conditions. As shown in Table 10 on page 100, peak flow rates from the Project Site would not increase under the Modified Project during a 25- or 50-year storm event. Therefore, the Modified Project would not create nor contribute to stormwater runoff levels that would exceed the capacity of the existing storm water drainage systems. Accordingly, consistent with the Certified EIR's conclusions for the Original Stadium Project, the Modified Project's potential surface water hydrology impacts would be less than significant. No mitigation measures are required.

The Certified EIR also analyzed the Original Stadium Project's potential operational impacts on groundwater. As stated therein, the Project Site is not an area that provides substantial groundwater recharge, and the Original Stadium Project would not affect this condition. Furthermore, the Project Site is not a source of groundwater pumping for potable water usage. Therefore, the Certified EIR concluded that impacts related to groundwater would be less than significant during operation of the Original Stadium Project. Similar to the Original Stadium Project, the Modified Project would be serviced by the municipal water and sewer system, and no production wells would be installed. As stated above, the amount of impervious surface area on-site would be approximately the same under the Modified Project as compared to existing conditions. The Modified Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge since limited groundwater recharge currently occurs on-site. Furthermore, the Modified Project would implement BMPs pursuant to SUSMP

Table 10
Modified Project Peak Stormwater Flowrates

Site Condition	Rational Method Runoff Coefficient	Q25 (cfs)	Q50 (cfs)
Existing	0.88 (25-yr); 0.89 (50-yr)	38.1	43.8
Proposed	0.88 (25-yr); 0.89 (50-yr)	38.1	43.8

Q25 = peak runoff rate during 25-year storm event
Q50 = peak runoff rate during 50-year storm event
cfs = cubic feet per second
Source: Langan Engineering and Environmental Services, Inc., 2015.

requirements (pursuant to Certified EIR Mitigation Measure E-2) and the City's LID Ordinance to control and mitigate surface pollutants. Therefore, consistent with the conclusions in the Certified EIR, the Modified Project would result in less than significant impacts associated with groundwater hydrology and quality.

Based on the analysis above, through the implementation of mitigation measures identified in the Certified EIR, operation of the Modified Project would not result in any new significant impacts with respect to hydrology and water quality, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(c) Mitigation Measures

The following mitigation measures were included in the Certified EIR to reflect the regulatory requirements that would ensure that the Original Stadium Project's hydrology and water quality impacts would be less than significant. These Mitigation Measures would continue to be implemented as part of the Modified Project, as revised, and have been incorporated into the MMP for the Modified Project included in Appendix A of this Addendum:

EIR Mitigation Measure MM E-1: The ~~Project~~ Applicant shall ensure that a Stormwater Pollution Prevention Plan (SWPPP) is prepared and implemented during construction. The SWPPP shall be prepared to the satisfaction of the City of Los Angeles Department of Building and Safety prior to the issuance of building permits.

EIR Mitigation Measure MM E-2: The ~~Project~~ Applicant must prepare and implement a SUSMP, in accordance with the LA County RWQCB MS4 Program. The SUSMP shall be submitted and prepared to the

satisfaction of the City of Los Angeles Department of Building and Safety.

EIR Mitigation Measure MM E-3: The ~~Project~~ Applicant must comply with LARWQCB's General NPDES Permit and General Waste Discharge Requirements (WDRs) (Order No. R4-2003-0111, NPDES No. CAG994004) governing construction-related dewatering discharges (the "General Dewatering Permit").

J. Land Use and Planning

(a) Consistency with Regulatory Framework

The Certified EIR for the Original Stadium Project concluded that impacts related to consistency with applicable land use plans and policies would be less than significant under the Original Stadium Project (refer to Section IV.F, Land Use, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.F-13 of the Certified EIR. Specifically, the Certified EIR determined that the Original Stadium Project would be consistent with the underlying General Plan and zoning designations on the Project Site, the Exposition/University Park Redevelopment Plan,[56] the California Museum of Science and Industry (CMSI)/Exposition Park Master Plan, and applicable regional plans and regulations. Although impacts would be less than significant, the Certified EIR included Mitigation Measure F-1 to reinforce requirements for permits and discretionary approvals to ensure land use consistency. Consistent with the Original Stadium Project, the proposed stadium under the Modified Project would have a maximum seating capacity of approximately 22,000 attendees and would host MLS games, USC field events, open-air entertainment events such as concerts and civic gatherings, and exhibition soccer games. The general use of the stadium would not change with the design modifications proposed under the Modified Project. The Modified Project would also provide additional Ancillary Uses to the Original Stadium Project including conference facility and office space, a museum, and retail and restaurant uses. The Modified Project would also require the following discretionary approvals that were not specifically considered in the Certified EIR's analysis of the Original Stadium Project:

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[56] *On December 29, 2011, the California Supreme Court issued its decision in the* California Redevelopment Association v. Matosantos *case. The decision upheld the recently enacted State law, Assembly Bill (AB)X1 26, dissolving all California redevelopment agencies, including the Community Redevelopment Agency of the City of Los Angeles. The dissolution of the agencies became effective February 1, 2012. ABX1 26, however, did not dissolve the redevelopment plans. Therefore, the Exposition/University Park Redevelopment Plan and its requirements for development are still in effect and are overseen by a Designated Local Authority (DLA).*

- Amendment of the Coliseum District Specific Plan to expressly allow development standards for Modified Project (e.g., seating capacity, FAR, height, signage, parking and uses);

- Director's Review (pursuant to Coliseum District Specific Plan);

- Alcohol Use Approval to expressly allow all establishments that would sell and serve alcohol (pursuant to Coliseum District Specific Plan);

- Sign District/Supplemental Use District (Zone Change) for Signage;

- Possible Board of Police Commissioners permit for extended interior construction hours;

- Possible approval of a property and/or project agreement by the Coliseum Commission authorizing the development of the Modified Project on the Project Site; and

- Possible approval of a Non-Disturbance Agreement or other agreements for LAFC's operation of the Modified Project by the State of California (California Science Center—Sixth District Agricultural Association), including use of State-owned properties in Exposition Park for signage, parking, and construction staging.

The following analysis focuses on the potential for the Modified Project's Ancillary Uses and additional discretionary approvals to result in new significant impacts with respect to land use consistency that were not previously identified in the Certified EIR.

As stated in the Certified EIR, the Project Site is subject to the following state, regional, and local land use regulatory authorities, plans, and policies: (1) State—CMSI/ Exposition Park Master Plan; (2) Regional—Southern California Association of Governments' (SCAG) Regional Comprehensive Plan and Guide (RCPG), 2008 Regional Comprehensive Plan (RCP), and Compass Growth Vision; South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan (AQMP); Regional Water Quality Control Board (RWQCB); and Metropolitan Transportation Authority's (MTA) Congestion Management Plan (CMP); and (3) Local—the City of Los Angeles' General Plan, South Los Angeles Community Plan, Exposition/University Park Redevelopment Plan, and Planning and Zoning Code. The Project Site is also regulated by the City of Los Angeles' Coliseum District Specific Plan. Additionally, since certification of the Certified EIR, SCAG adopted its 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which also pertains to the Project Site. The AQMP was also updated in 2012. Finally, while the Certified EIR addressed the Project Site's location within the Los Angeles State Enterprise Zone, the California State Enterprise Zone program has since ended and is no longer applicable to the Project Site. The Modified

Project's consistency with the applicable land use plans and policies noted above is addressed below.

(i) State

As stated in the Certified EIR, the CMSI/Exposition Park Master Plan (Master Plan) includes goals and objectives oriented around developing, preserving, and restoring the following areas within Exposition Park: (1) the CMSI; (2) the Science Museum School; (3) the Science Educational Resource Center; (4) the California African-American Museum; (5) park landscaping and open space areas; (6) parking and circulation facilities; and (7) ancillary infrastructure improvement areas. The Master Plan does not include any goals or objectives related to specific alterations or renovation of the Sports Arena, and makes no specific reference with respect to goals or objectives for the long-term use of the Sports Arena. Notwithstanding, the Certified EIR determined that the Original Stadium Project would be consistent with the six general objectives of the Master Plan because it would: reinforce Exposition Park's role as a major regional community resource in the southern California region by replacing the underutilized Sports Arena with a modern, world-class sports complex; provide enhanced landscape and pedestrian circulation areas; implement a traffic management plan to minimize traffic and parking impacts on days when major events are scheduled; be compatible in scale, height, materials, architectural quality and site orientation within the context of Exposition Park as well as the surrounding built environment; and provide provisions for coordinated marketing, security, maintenance arrangements, parking, transit access, and programming with Exposition Park management, as needed for the redeveloped Project Site. The Modified Project's proposed modifications to the Original Stadium Project would not change these conclusions.

Specifically, the Modified Project would continue to reinforce Exposition Park's role as a major regional community resource in southern California by replacing the Sports Arena with a modern, world-class sports complex, and would involve substantially similar features to the Original Stadium Project that the Certified EIR concluded would be consistent with the Master Plan. In addition, the Modified Project would include enhanced landscape and pedestrian improvements as compared to the Original Stadium Project, including: (1) the Northwest Plaza, which would be designed to provide a welcoming pedestrian environment with a mix of hardscape and landscaped areas, and could include water features, public art, and seating areas; and (2) the Figueroa Street pedestrian improvements, which would include a broad pedestrian sidewalk featuring enhanced landscape and streetscape, providing sufficient space for patrons to circulate and queue on event days, and, an inviting and safe pedestrian environment on non-event days. The Modified Project's proposed Ancillary Uses would provide additional amenities to support stadium operations, including year-round restaurant and retail uses, which would enable the creation of a state-of-the-art sports and entertainment complex that is better able to

compete with similar, modern facilities. The Ancillary Uses would therefore further promote the Modified Project's consistency with Master Plan Objective 1, to reinforce the park as a regional and community resource, and Objective 3, to develop employment and cultural opportunities within the park to benefit area residents. Further, as discussed in Section IV.A, Aesthetics, on page 34 of this Addendum, the scale, mass, and height of the proposed stadium and Ancillary Uses would be compatible with surrounding uses within and adjacent to Exposition Park, and therefore the Modified Project would continue to be consistent with Master Plan Objective 5. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, the Modified Project would be consistent with the general objectives of the Master Plan, and impacts would be less than significant. No mitigation measures are required.

(ii) Regional

As stated in the Certified EIR, the Project Site is located within SCAG's planning region. SCAG is the federally designated Metropolitan Planning Organization for six Southern California counties, including the County of Los Angeles. As such, SCAG is mandated to create regional plans that address transportation, growth management, hazardous waste management, and air quality. SCAG plans that currently apply to the Project Site include the 2012–2035 RTP/SCS, the Compass Growth Vision, and the 2008 RCP.

SCAG's 2012–2035 RTP/SCS, adopted in April 2012, presents a long-term transportation vision through the year 2035 for its six county region. The mission of the 2012–2035 RTP/SCS is to provide "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians."[57] The 2012–2035 RTP/SCS emphasizes sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of this approach, the 2012–2035 RTP/SCS establishes High-Quality Transit Areas, which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[58] Local jurisdictions are encouraged to focus housing and employment growth within High-Quality Transit Areas. The Project Site is located within a High-Quality Transit Area as designated by the 2012–2035 RTP/SCS.[59]

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[57] *SCAG 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy, pp. viii, available at http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx, accessed August 13, 2015.*

[58] *Ibid, pp. 114.*

[59] *Ibid, Exhibit 4.9: High-Quality Transit Areas (HQTA) SCAG Region, pp. 136.*

The Certified EIR did not include a discussion of the Original Stadium Project's consistency with the 2012–2035 RTP/SCS since the 2012–2035 RTP/SCS was adopted after the certification of the Certified EIR. However, the Certified EIR included an analysis of the Original Stadium Project's consistency with SCAG's 2008 Regional Transportation Plan (RTP), which preceded the 2012–2035 RTP/SCS (see Table IV.F-1 in the Certified EIR). The Certified EIR explained that the Project Site is already well served by regional and local transit lines. In addition, the Certified EIR explained that the Original Stadium Project would comply with Title 20 and Title 24 standards pertaining to water and energy efficiency standards. Therefore, the Certified EIR concluded that the Original Stadium Project would be consistent with the goals of the 2008 RTP to maximize mobility and accessibility for all people and goods in the region; preserve and ensure a sustainable regional transportation system; protect the environment, improve air quality and promote energy efficiency; and encourage land use and growth patterns that complement transportation investments, among others.

Like the Original Stadium Project, the Modified Project represents an infill development within an existing urbanized area that would concentrate new development in proximity to public transit opportunities (e.g., Expo Light Rail, Harbor Transitway BRT station), thereby minimizing vehicle trips, vehicle miles traveled (VMT), and resulting air pollution. The availability and accessibility of public transit in the Project area is evidenced by the Project Site's location within a designated High-Quality Transit Area. By focusing new development within a designated High-Quality Transit Area, the Modified Project would be consistent with regional growth strategies promoted in the 2012–2035 RTP/SCS, which represent widely recognized "smart growth" planning strategies that promote higher density, infill development with access to public transit in an effort to reduce urban sprawl and its associated environmental effects. Furthermore, the Modified Project would provide bicycle parking for a minimum of 440 bicycles (two percent of the proposed stadium seating capacity) to encourage bicycling to events at the stadium. Also like the Original Stadium Project, the Modified Project would revitalize an urban infill site that is already equipped with the infrastructure to support a major sports and entertainment venue by replacing the underutilized Sports Arena with a modern, world-class sports complex. In addition, the Modified Project would include enhanced landscape and pedestrian improvements as compared to the Original Stadium Project, including the Northwest Plaza, which would be designed to provide a welcoming pedestrian environment with a mix of hardscape and landscaped areas, and could include water features, public art, and seating areas, as well as other public open space areas around the Project Site. As discussed in Section IV.G, Greenhouse Gas Emissions, on page 75 of this Addendum, the Modified Project would incorporate "Green" principles throughout the development to comply with the City of Los Angeles Green Building Code (Chapter IX, Article 9, of the LAMC) and the sustainability intent of the U.S. Green Building Council's LEED® program. These include energy conservation, water conservation, and waste reduction features that exceed the requirements and commitments applicable to the Original Stadium Project. Therefore,

consistent with the conclusions in the Certified EIR for the Original Stadium Project (which pertained to 2008 RTP consistency), the Modified Project would be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS. Impacts would be less than significant, and no mitigation measures are required.

As discussed in the Certified EIR, SCAG's Compass Growth Vision, adopted in 2004, encourages better relationships between housing, transportation, and employment. The Compass Growth Vision is driven by four key principles: (1) Mobility –Getting where we want to go, (2) Livability—Creating positive communities, (3) Prosperity—Long-term health for the region, and (4) Sustainability—Preserving natural surroundings. SCAG's 2004 Growth Vision Report identified 2% Strategy Opportunity Areas, which represented areas of the region that were targeted for growth, where projects, plans, and policies consistent with the key principles would best serve the goals of the Compass Growth Vision to improve mobility for all residents, foster livability in all communities, enable prosperity for all people, and promote sustainability for future generations. Since certification of the Certified EIR, the 2% Strategy Opportunity Areas have been effectively replaced with the High-Quality Transit Areas established in the 2012–2035 RTP/SCS, as discussed above. The Certified EIR stated that the Original Project would provide an updated public venue for outdoor recreational opportunities or civic events in response to changing community needs and market conditions, revitalizing the Project Site and providing enhanced landscape and community use options when compared to the existing Sports Arena facility and site conditions. In addition, the Certified EIR stated that the Original Stadium Project would provide employment opportunities and would comply with Title 20 and Title 24 standards pertaining to water and energy efficiency standards. Therefore, the Certified EIR concluded that the Original Stadium Project would be consistent with the Compass Growth Vision principles. The Modified Project builds upon the energy conservation features previously identified in the Certified EIR and would comply with Title 24 of the California Code of Regulations, including Part 6 (Energy Efficiency Standards for Residential and Nonresidential Buildings) and Part 11 (California Green Building Standards Code, commonly referred to as the CALGreen Code), as well as the City of Los Angeles Green Building Code (2013), which incorporates the CALGreen Code into Chapter IX of the Los Angeles Municipal Code (LAMC), in effect at the time of the Modified Project's permit application. The Modified Project would also be designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-BD+C or LEED-ND Rating System (v.3), or equivalent green building standards. For the reasons discussed above in relation to consistency with the 2012–2035 RTP/SCS, the Modified Project would also be consistent with the principles set forth in the Compass Growth Vision, consistent with the conclusions in the Certified EIR for the Original Stadium Project. Impacts would be less than significant, and no mitigation measures are required.

As discussed in the Certified EIR, SCAG's Regional Comprehensive Plan (RCP) was adopted by SCAG in October of 2008 and serves as an advisory document for (voluntary) use by local governments in the SCAG region as an informational resource, and as a reference document for their use in developing plans and addressing local issues of regional significance. The 2008 RCP replaced SCAG's 1996 Regional Comprehensive Plan and Guide (RCPG). Because of its advisory nature, the RCP is not used in SCAG's Intergovernmental Review process for regionally significant projects. Rather, SCAG reviews new major regional projects based on consistency with the 2012–2035 RTP/SCS and Compass Growth Vision, described above. As stated in the Certified EIR, according to SCAG, the Original Stadium Project was not considered regionally significant pursuant to SCAG Intergovernmental Review (IGR) Criteria and Section 15206 of the CEQA Guidelines. Since consistency with the 2008 RCP was not required, a consistency analysis was not provided in the Certified EIR, though, as discussed above, the Certified EIR did address the Original Stadium Project's consistency with the 2008 RTP (which preceded the 2012–2035 RTP/SCS and was in effect at the time of the Certified EIR) and the Compass Growth Vision. The changes proposed by the Modified Project would not make the Modified Project regionally significant pursuant to SCAG and CEQA criteria. Although an analysis of consistency with the RCP is not required, as was the case at the time the Certified EIR was prepared, it is noted that the Modified Project would be substantially consistent with the applicable goals and policies set forth in the RCP for the reasons discussed above in relation to consistency with the 2012–2035 RTP/SCS.

As stated in the Certified EIR, the Original Stadium Project is subject to the requirements of the SCAQMD's AQMP. The AQMP was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the air basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. A project is considered consistent with the AQMP if it is consistent with the population, housing, and employment assumptions that form the basis of the AQMP. The Certified EIR determined that the Original Stadium Project would be consistent with the 2007 AQMP in effect at the time the Certified EIR was prepared because it would be consistent with applicable population, housing, and employment projections. As analyzed in Section IV.C, Air Quality, on page 49, the Modified Project would also be consistent with the 2012 AQMP, which was adopted subsequent to the preparation of the Certified EIR, and its applicable population, housing, and employment projections. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, impacts would be less than significant and no mitigation measures are required.

As discussed in the Certified EIR, the Original Stadium Project is subject to the requirements of the Los Angeles Regional Water Quality Control Board (RWQCB). The Certified EIR determined that the Original Stadium Project would be consistent with

RWQCB requirements during construction and operation (e.g., requirements pursuant to the National Pollution Discharge Elimination System (NPDES) statewide General Construction Activity Permit). As analyzed in Section IV.I, Hydrology and Water Quality, on page 95 of this Addendum, the Modified Project would also be consistent with applicable RWQCB requirements, consistent with the conclusions in the Certified EIR for the Original Stadium Project. Additionally, the Modified Project would be required to comply with the City's Low Impact Development (LID) Ordinance (Ord. No. 181899), which expanded the applicability of SUSMP requirements by imposing rainwater LID strategies on projects that require building permits. The LID Ordinance was adopted in November 2011 and officially became effective on May 12, 2012.[60] Therefore, impacts would be less than significant and no mitigation measures are required.

Finally, the Certified EIR explained that the Original Stadium Project is subject to the requirements of the Los Angeles County Metropolitan Transportation Authority's (Metro) Congestion Management Program (CMP). The CMP requires that, when an environmental impact report is prepared for a project, traffic and public transit impact analyses be conducted for select regional facilities based on the quantity of project traffic expected to use those facilities. The Certified EIR determined that the Original Stadium Project would be consistent with the CMP because it would not significantly impact any CMP roadway segments or freeway on-/off-ramps. As analyzed in Section IV.O, Traffic/Transportation/ Parking, on page 149 of this Addendum, the Modified Project would also be consistent with the CMP and would not significantly impact any CMP roadway segments, freeway on-/off-ramps, or transit facilities. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, impacts would be less than significant and no mitigation measures are required.

(iii) Local

The City of Los Angeles General Plan Framework Element (General Plan Framework), adopted in December 1996 and readopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles (City) and defines citywide policies regarding land use. The General Plan Framework defines citywide policies that influence the Community Plans and most of the City's General Plan Elements. The policies are organized by chapters that address land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation, and infrastructure and public services.

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[60] *LA Stormwater, Low Impact Development (LID) 2-Sided Brochure, www.lastormwater.org/wp-content/files_mf/lidbrochure4.19.12.pdf, accessed May 2, 2014.*

The Land Use Chapter of the General Plan Framework provides primary objectives to support the viability of the City's residential neighborhoods and commercial and industrial districts and to encourage sustainable growth in appropriate locations. The Land Use Chapter establishes land use categories which are broadly described by ranges of intensity/density, heights, and lists of typical uses. The designated land use categories are Neighborhood Districts, Community Centers, Regional Centers, Downtown Center, Mixed-Use Boulevards, and Industrial Districts. These land use categories do not connote land use entitlements or affect existing zoning for properties in the City and are intended to serve as a guideline for the Community Plans.[61] The Project Site is located adjacent to and partially within a designated Regional Center that generally corresponds with Figueroa Street.[62] A Regional Center is defined as:

> *…a focal point of regional commerce, identity and activity and containing a diversity of uses such as corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities, and supporting services. Generally different types of Regional Centers will fall within the range of floor area ratios from 1.5:1 to 6.0:1. Some will only be commercially oriented; others will contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by 6- to 20-stories (or higher). Regional Centers are usually major transportation hubs.*

The Land Use Chapter also indicates that Martin Luther King, Jr. Boulevard adjacent to the Project Site is designated as a Mixed Use Boulevard.[63] Mixed Use Boulevards are described as connections between the City's neighborhood districts and community, regional, and Downtown centers. Mixed-use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas. Additionally, the Framework Element designates the Project Site as being located within a Pedestrian-Oriented District that generally corresponds with Figueroa Street.[64] Pedestrian-Oriented Districts are defined as "commercial and mixed-use

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[61] *As indicated in Chapter 1 of the General Plan Framework, the General Plan Framework neither overrides nor supersedes the Community Plans. It guides the City's long-range growth and development policy, establishing citywide standards, goals, policies and objectives for citywide elements and Community Plans. The General Plan Framework is flexible, suggesting a range of uses within its land use definitions. Precise determinations are made in the Community Plans.*

[62] *General Plan Framework, Figure 3-2, Long Range Land Use Diagram—South Los Angeles, http://planning.lacity.org/cwd/framwk/chapters/03/F32SLAMp.pdf, accessed August 14, 2015.*

[63] *Ibid.*

[64] *General Plan Framework, Figure 8-2, Citywide Pedestrian and Transit-Related Priorities, http://cityplanning.lacity.org/cwd/framwk/chapters/08/fig8-2.htm, accessed August 14, 2015.*

districts that promote pedestrian activity. Such districts can become community-oriented focal points that are differentiated from the prevailing pattern of development and reduce the use of the automobile."[65]

The Certified EIR did not include a detailed analysis of the Original Stadium Project's consistency with the General Plan Framework. Therefore, the following discussion focuses on the Modified Project's consistency with the various land use designations established for the Project Site and the vicinity in the General Plan Framework. As described above, each of these designations supports an overall vision of high-density, mixed-use, and pedestrian-oriented development in the Project Site vicinity, particularly along the Figueroa Street corridor. The Modified Project would implement the intent of the General Plan Framework Land Use Element by revitalizing the Project Site and providing enhanced landscape and community use options when compared to the existing Sports Arena facility. Specifically, the Modified Project would replace the underutilized Sports Arena with a modern, world-class sports complex with direct access from Figueroa Street; provide enhanced landscape and pedestrian circulation areas including pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas and potentially including water features, public art, and seating areas; and provide a mix of land uses that would support stadium operations, including year-round restaurant and retail uses, thereby enabling the creation of a state-of-the-art sports and entertainment complex that can serve as a major regional destination. Further, as discussed in Section IV.A, Aesthetics, on page 34 of this Addendum, the scale, mass, and height of the proposed stadium and Ancillary Uses would be compatible with surrounding uses within and adjacent to Exposition Park. Therefore, the Modified Project would be consistent with the intent of the General Plan Framework Land Use Element. Impacts would be less than significant and no mitigation measures are required.

The South Los Angeles Community Plan functions as the Land Use Element of the City's General Plan that is applicable to the Project Site. As discussed in the Certified EIR, the South Los Angeles Community Plan designates the Project Site and all of Exposition Park as Open Space (OS), and also identifies Exposition Park as a "major opportunity site." The OS designation permits parks, community centers and public serving facilities under the ownership or operation of a public agency. The Project Site is owned by the Sixth District Agricultural Association, a state agency. The Certified EIR determined that the Original Stadium Project would be consistent with the Open Space (OS) designation by providing a publicly oriented facility, and that it would be consistent with relevant policies set forth in the South Los Angeles Community Plan related to preserving recreational

[65] *General Plan Framework, Chapter 3, Land Use.*

facilities and park space, and fostering public appreciation of historic resources in Exposition Park, specifically the Coliseum.

As compared to the Original Stadium Project, the Modified Project's stadium component would be similarly consistent with the South Los Angeles Community Plan. In addition, the Modified Project and its proposed Ancillary Uses would promote consistency with other South Los Angeles Community Plan policies. Specifically, the Modified Project's proposed museum would be consistent with the definition of Open Space in the Community Plan to provide for educational opportunities and cultural values. In addition, by developing a state-of-the-art sports and entertainment complex while preserving significant open space and public gathering areas, the Modified Project would be consistent with the definition of Open Space in the Community Plan to preserve and create community identity. The Modified Project's restaurant, retail, conference and office space uses, which are all ancillary facilities supporting the stadium, would also be consistent with the South Los Angeles Community Plan's principles for the "major opportunity site" of Exposition Park, which includes providing the opportunity for a variety of jobs and job training for community residents and allowing development that is reflective of community needs. By providing increased job opportunities within Exposition Park in uses that would operate seven-days a week, the Modified Project's Ancillary Uses would help address the community's need for increased local jobs, while providing a variety of jobs and job training for area residents. In addition, as compared the Original Stadium Project, the Modified Project would provide enhanced pedestrian improvements and open space areas, including approximately 143,000 square feet of improved public open space around the Project Site that would include pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas and potentially including water features, public art, and seating areas. These features would further South Los Angeles Community Plan Objective 5-1 to develop new open space areas in Exposition Park. Additionally, as discussed in Section IV.E, Cultural Resources, on page 61 of this Addendum, impacts to historic resources, including the adjacent Coliseum, would be less than significant and would not change under the Modified Project. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, the Modified Project would remain consistent with the South Los Angeles Community Plan. Impacts would be less than significant and no mitigation measures are required.

As discussed in the Certified EIR, the Project Site and all of Exposition Park are located within the Exposition/University Park Redevelopment Plan. Specifically, the Project Site is located within the Redevelopment Plan's Exposition Sub Area. As explained in the Certified EIR, real property that is owned or controlled by the State of California or the Coliseum Commission, including the Project Site, is not subject to the requirements and

policies of the Redevelopment Plan.[66] Nevertheless, the Certified EIR analyzed the Original Stadium Project's consistency with the Redevelopment Plan and determined it would be consistent with the Project Site's Public Use designation because it would replace the underutilized Sports Arena with a modern, world-class sports complex that is consistent with the site's history and would result in the development of a public venue for public, private and civic use. Further, because it would foster economic growth along the Figueroa Corridor, the Certified EIR determined that the Original Stadium Project would be consistent with the goals identified in the Community Redevelopment Agency of the City of Los Angeles' Five Year Implementation Plan. Finally, the Certified EIR examined the applicable Redevelopment Plan goals to the Project Site, including goals related to the elimination of blight and to conserve, rehabilitate, and redevelop the Expanded Project Area and provide for well-planned community uses and facilities, and determined that the Original Stadium Project would be generally consistent with those goals.

Like the Original Stadium Project, the Modified Project is located on the Project Site owned by the Sixth District Agricultural Association (State of California) and controlled by the Coliseum Commission, and accordingly the Modified Project is not subject to the requirements of the Exposition/University Park Redevelopment Plan. Nevertheless, an analysis of Redevelopment Plan consistency is provided herein consistent with the Certified EIR analysis. The modifications proposed under the Modified Project would not change the Certified EIR's consistency analysis with the Redevelopment Plan. The Modified Project would continue to provide a world-class sports complex for public, private and civic use that is consistent with the Project Site's history. Further, the addition of the Modified Project's Ancillary Uses would provide for a more cohesive and successful development that is comparable to other recently-constructed MLS venues, and would further applicable goals related to fostering economic growth on the Figueroa Corridor, the elimination of blight, the redevelopment of the Project Area, and the provision of uses and facilities serving the community. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project, the Modified Project would be consistent with the Redevelopment Plan. Impacts would be less than significant and no mitigation measures are required.

As stated in the Certified EIR, the Project Site is zoned OS-1XL (Open Space, Extra Limited Height District 1) under the City's Planning and Zoning Code, as is the majority of

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[66] *Exposition Park was added to the Hoover Redevelopment Plan Area in 1983, and in 1984 the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) prepared a Master Plan for Exposition Park. However, the Master Plan was contested and was never formally adopted. In 1985, the CRA/LA and the State of California reached a settlement agreement that voided CRA/LA consultation, review, or control over State of California or Coliseum Commission properties within Exposition Park. (EPICC EIR, CRA/LA, 1999).*

Exposition Park. The Certified EIR determined that the Original Stadium Project would be consistent with allowable uses in the OS zone, which include park and recreation facilities and athletic fields. In addition, the Certified EIR determined that the Original Stadium Project would exceed the limitations of height district 1XL, and would need to seek discretionary relief from the Department of City Planning. The Certified EIR concluded that following the approval of discretionary land use entitlements from the City, the Original Stadium Project would be consistent with the applicable provisions of the Planning and Zoning Code, and no land use impact would occur.

In addition to the Project Site's zoning designation of OS-1XL, the Project Site is also located within the boundaries of the Coliseum District Specific Plan (Specific Plan). The Specific Plan provides additional land use regulations applicable to the site of the existing Sports Arena as well as the adjacent site of the Coliseum and immediately surrounding ancillary areas. As explained in Section 3.B of the Specific Plan, "[w]henever this Specific Plan contains provisions that establish regulations... which are different from, more restrictive or more permissive than what would be allowed pursuant to the provisions contained in the LAMC [Los Angeles Municipal Code], this Specific Plan shall prevail and supersede the applicable provisions of the LAMC and those relevant ordinances." Therefore, the land use regulations of the Specific Plan supersede those of the LAMC, including those of the OS-1XL zone.

The Specific Plan currently permits a variety of uses in the Specific Plan area, including the operation of sports, entertainment and public gathering facilities, the sale of concessions and alcoholic beverages for consumption on-site, the sale of merchandise and other retail uses, offices, restaurants, bars, cafes and outdoor eating areas, and museums and parking facilities. The Modified Project proposes a Specific Plan Amendment, an entitlement request that was not included as part of the Original Stadium Project. The proposed Specific Plan amendment would slightly modify the boundaries of the Specific Plan to align the northern and eastern Project Site boundaries with the southern and western edges of the South Coliseum Drive and Figueroa Street rights-of-way, respectively, and would expressly allow development standards for the Modified Project (e.g., seating capacity, FAR, height, signage, parking and uses). Specifically, the proposed Specific Plan Amendment would expressly permit the development of an approximately 22,000 seat soccer stadium and approximately 119,000 gross square feet (approximately 105,900 square feet of floor area) of ancillary facilities as described in Section III, Project Description, on page 4. The total amount of development would not be permitted to exceed approximately 641,000 gross square feet. The maximum height of the stadium would not be permitted to exceed 115 feet above grade, and the maximum height of the associated ancillary facilities would be limited to approximately 75 feet above grade. In accordance with existing Specific Plan requirements, front, side, or rear yards or building setbacks would not be required.

The proposed Specific Plan amendment would also clarify the applicability of certain Specific Plan provisions to the Project Site. Although the Specific Plan area encompasses the Project Site, many of the purposes, definitions, permitted uses, design regulations, on-site alcohol regulations, and signage provisions currently stated in the Specific Plan either contemplate development at the adjacent Coliseum property, or do not clearly establish parameters for redevelopment of the Sports Arena. Further, the boundaries of various zones within the Specific Plan do not currently reflect the boundaries of the Coliseum property and the Project Site. The proposed Specific Plan Amendment would provide for the proposed development and operation of the Modified Project, as well as updated internal boundaries that appropriately distinguish between the Coliseum property and the Project Site, along with immediately surrounding areas and parking lots that serve both properties and Exposition Park.

Although the Modified Project is proposing an amendment to the Specific Plan to clarify certain provisions and to provide applicable development parameters for the Project Site, the Modified Project is compatible with the Specific Plan's generally permitted uses described above. Specifically, the Modified Project would include the operation of a sports, entertainment and public gathering facility; the sale of alcoholic beverages for consumption on-site; retail uses; offices; restaurants, bars, cafes and outdoor eating areas; a museum, exhibitions, cultural facilities; and other related uses. The Modified Project's application of these uses to the Project Site is generally consistent with the intent of the Specific Plan to provide for sports and cultural destination uses, along with ancillary facilities that support those uses within the Specific Plan area. Thus, with approval of the proposed Specific Plan Amendment, the Modified Project would be fully consistent with the Specific Plan, including all uses and facilities, development parameters, design regulations, and internal Specific Plan boundaries. Because the Specific Plan supersedes the LAMC, consistent with the conclusions in the Certified EIR for the Original Stadium Project, the Modified Project would also be consistent with the LAMC. Further, pursuant to Section 6 of the Specific Plan, the City Planning Director must review all projects for compliance with the Specific Plan before any demolition, grading, foundation, building, sign or use of land permit can be issued. As discussed above, the Applicant has requested this compliance review for the proposed Modified Project, which will further confirm that the Modified Project is consistent with the Specific Plan, as amended. Therefore, impacts would be less than significant and no mitigation measures are required.

The Original Stadium Project did not include a detailed signage program. However, the Certified EIR stated that in the absence of any specific programmatic goals for signage, signage under the Original Stadium Project would be developed in a manner that is consistent with and adheres to all of the applicable codes of the LAMC, the design guidelines of the South Los Angeles Community Plan, as it pertains to signage, and the rules and regulations set forth in the Specific Plan. Since the certification of the Certified

EIR, the City has modified its policy regarding signage and now authorizes signage through a Supplemental Use Sign District (SUD) rather than being authorized through a Specific Plan. Therefore, as discussed in Section III, Project Description, on page 4 of this Addendum, the Modified Project is also requesting approval of an SUD to allow for the types and amounts of signage that would be included in the proposed development. Consistent with the signage program allowed under the existing Specific Plan, the proposed SUD would encompass the Project Site as well as all of the Specific Plan area. As part of the proposed Specific Plan Amendment, the existing signage authorized in the Specific Plan, which includes some signage for the Project Site, the Coliseum, and surrounding areas, would be removed from the Specific Plan and relocated into the proposed SUD, along with modifications to permit the Modified Project's signage program. Signage rights previously allowed by the Specific Plan for the Coliseum and other areas in the Specific Plan area that are unrelated to the Modified Project's signage program would not change under the proposed SUD. These actions would be consistent with the City's current policy mechanisms for regulating signage and would not represent a significant land use consistency impact. With approval of the proposed SUD, the Modified Project would be consistent with applicable land use plans and regulations related to signage. Impacts would be less than significant and no mitigation measures are required. For an analysis of the potential aesthetic impacts of the proposed signage program, refer to Section IV.A, Aesthetics, of this Addendum.

Because the Modified Project's Ancillary Uses include up to 2,550 square feet of fast food restaurant floor area, analysis of the Modified Project's consistency with applicable City land use regulations concerning fast food restaurants is required. City of Los Angeles Ordinance No. 180103 imposes interim regulations on the issuance of all permits related to the establishment of new fast food restaurants on commercial or industrial zoned properties located on streets designated as Major Highway Class I, Major Highway Class II and Secondary Highway in the West Adams–Baldwin Hills–Leimert Community Plan area and portions of the South Los Angeles and Southeast Los Angeles Community Plan areas, including the Project Site. Ordinance No. 180103 only applies to stand-alone fast food restaurants. The fast food restaurant components of the Modified Project would be integrated with the stadium and other Ancillary Uses as part of a cohesive development, and would not include a stand-alone fast food establishment. Therefore, the Modified Project would not be inconsistent with Ordinance No. 180103. Impacts would be less than significant and no mitigation measures are required.

In addition, because the Modified Project would include on-site alcohol sales and service for a full line of alcoholic beverages, analysis of the Modified Project's consistency with applicable City land use regulations concerning alcohol sales is necessary. As discussed above, the Specific Plan currently allows for the sale and service of alcoholic beverages for on-site consumption on the Project Site and other areas in the Specific Plan,

subject to compliance with operational conditions set forth in the Specific Plan. Further, pursuant to Section 9 of the Specific Plan, each establishment selling alcoholic beverages in the Specific Plan area must obtain an Alcohol Use Approval from the Director determining their compliance with the Specific Plan. While the proposed Specific Plan Amendment would modify the existing zones established within the Specific Plan for alcohol consumption, it would not modify the Specific Plan's operational conditions for establishments selling alcoholic beverages. The Modified Project would comply with these requirements, and establishments selling alcoholic beverages would be required to obtain an Alcohol Use Approval from the Director as required by the Specific Plan. Because the Specific Plan supersedes other provisions of the LAMC, further analysis of other LAMC provisions related to alcohol sales and service is not required. In addition, City Ordinance No. 171681 prohibits off-site alcohol sales in the South Los Angeles area. However, the Modified Project's proposed sale and service of a full line of alcoholic beverages would be for on-site consumption only, which is permitted by the Specific Plan. Off-site alcohol sales would not be permitted. Therefore, the Modified Project would not be inconsistent with Ordinance No. 171681. Impacts would be less than significant and no mitigation measures are required.

As described above, the Certified EIR concluded that the Original Stadium Project would be consistent with the underlying General Plan and zoning designations, the Redevelopment Plan, the Master Plan, and applicable regional plans and regulations. Therefore the Certified EIR concluded that impacts to operational land use compatibility and consistency with the applicable land use plans and the zoning code would be less than significant and that no mitigation measures are required. Similarly, as described above, the Modified Project also would be consistent with all applicable land use plans and the zoning code with the approval of the proposed Specific Plan Amendment, the SUD, and the Alcohol Use Approval under the Specific Plan. Therefore, the Modified Project's potential impacts to operational land use compatibility and consistency with applicable land use plans and the zoning code would be less than significant. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to land use consistency, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(b) Mitigation Measures

The following mitigation measure was included in the Certified EIR to further reduce the Original Stadium Project's less-than-significant impacts with respect to land use consistency. This Mitigation Measure would continue to be implemented as part of the Modified Project and has been incorporated into the MMP for the Modified Project included

in Appendix A of this Addendum, but has been revised as follows to be consistent with the Modified Project:

EIR Mitigation Measure F-1: The Los Angeles Memorial Coliseum Commission shall obtain all applicable permits from the Building and Safety Department (and other state and municipal agencies, as may be required) for Project construction actions ~~associated with implementation of either Option 1 or Option 2 including, but not limited to a height variance~~.

(b) Land Use Compatibility

The Certified EIR for the Original Stadium Project concluded that impacts related to land use compatibility during construction would be significant and unavoidable under the Original Stadium Project (refer to Section IV.F, Land Use, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.F-13 of the Certified EIR. The analysis in the Certified EIR concluded that construction of the Original Stadium Project would cause temporary and intermittent impacts to adjacent land uses due to temporary increases in air emissions (including fugitive dust), noise, and traffic congestion. These potential effects are discussed in their respective sections of the Certified EIR, and mitigation measures are recommended to further reduce construction-related impacts to adjacent land uses. Nonetheless, the Certified EIR concluded that from a land use compatibility standpoint, construction impacts would be significant and unavoidable, although the extent of impacts would be temporary and sporadic and would only persist through the construction period. The potential environmental impacts from construction of the Modified Project are discussed in their respective sections of this Addendum, and it has been determined that the Modified Project would not result in new construction-related significant impacts or increase the severity of construction-related significant impacts that were previously evaluated and disclosed in the Certified EIR. From a land use compatibility standpoint, since construction activities under the Modified Project would be substantially similar to those under the Original Stadium Project in terms of overall scope, duration, and activities, land use compatibility impacts associated with construction of the Modified Project would be substantially the same as the Original Stadium Project. Accordingly, potential impacts would continue to be significant and unavoidable, but the changes proposed under the Modified Project would not increase the severity of those impacts analyzed in the Certified EIR.

The Certified EIR for the Original Stadium Project concluded that impacts related to land use compatibility during operation would be less than significant under the Original Stadium Project (refer to Section IV.F, Land Use, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.F-13 of the Certified EIR. The

analysis in the Certified EIR concluded that demolition of the Sports Arena and construction of the Original Stadium Project would maintain the existing, general-purpose use of the Project Site as a venue for sporting and entertainment events, cultural events, and civic events. The Certified EIR further states that the Project Site would continue to function as an integral part of the Exposition Park Master Plan as a public entertainment and civic space. Consistent with the Original Stadium Project, the proposed stadium under the Modified Project would have a maximum seating capacity of approximately 22,000 attendees and would host MLS games, USC field events, open-air entertainment events such as concerts and civic gatherings, and exhibition soccer games. The general use of the stadium would not change with the design modifications proposed under the Modified Project. The Modified Project would also provide additional Ancillary Uses to the proposed stadium analyzed in the Certified EIR, including conference facility and office space, a museum, and retail and restaurant uses. These types of land uses are consistent and compatible with other land uses within and around Exposition Park. For example, land uses within Exposition Park include museums and athletic facilities with associated office/administration, conference, retail, and restaurant spaces. Retail and restaurant uses are also located adjacent to the Project Site on the east side of Figueroa Street. Additional conference facility, office, retail, and restaurant uses are located within and adjacent to the USC main campus north of Exposition Park. Furthermore, similar to the Original Stadium Project, the Modified Project would not adversely alter the neighborhood or community through ongoing disruption, division, or isolation since the Project Site has historically been developed as a major sports, entertainment, and cultural venue since the late 1950s, a function that would be continued and expanded upon under the Modified Project. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.F, Land Use and Planning, of the Certified EIR), impacts with respect to land use compatibility during operation would be less than significant under the Modified Project. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to land use compatibility, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

K. Mineral Resources

The Certified EIR for the Original Stadium Project concluded that no impacts to mineral resources would occur under the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR). Significant impacts to mineral resources could occur if a project were to result in the loss of availability of a mineral resource or a mineral resource recovery site. The eastern portion of the Project Site is located within a

Mineral Resource Zone (MRZ) designated by the State Geologist.[67] This area, designated as MRZ-2, corresponds with the current and ancestral Los Angeles River basin, which yields the potential for sand and gravel extraction but has been largely redeveloped with existing land uses.[68] Notwithstanding its location within an MRZ, no mineral extraction operations currently occur on the Project Site or within the Project vicinity. Additionally, the Project Site does not overlie any oil fields or contain any oil wells.[69] The stadium proposed to be developed under the Modified Project would be constructed within a portion of the footprint area currently occupied by the Sports Arena, although the subterranean excavation would need to be reconfigured to accommodate the proposed stadium foundation, resulting in a slightly larger footprint. In addition, surface grading would be required to install the building pads for the proposed Ancillary Uses. However, no mineral extraction operations have occurred or currently occur within the Project Site, or are proposed under the Modified Project. In addition, such operations would not be consistent with the existing and planned use of the Project Site within Exposition Park, which is a regional destination for sports, entertainment, cultural, social, and civic events in the urban core of Los Angeles. Thus, the Modified Project would not result in the loss of availability of a mineral resource or a mineral resource recovery site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), no impacts with respect to mineral resources would occur under the Modified Project. No mitigation measures are required. Accordingly, the Modified Project would not result in any new significant impacts with respect to mineral resources, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

L. Noise

The following analysis of potential noise impacts is based on the analysis provided in Section IV.G, Noise, of the Certified EIR, and on the Noise Study prepared for the Modified Project by Acoustical Engineering Services (AES), dated August, 2015, which is included in Appendix O of this Addendum. The Noise Study evaluates the noise sources associated with the Modified Project and determines whether the Modified Project would result in new significant noise impacts not previously identified in the Certified EIR.

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[67] *California Division of Mines and Geology, Mineral Land Classification Map, Hollywood Quadrangle, June 1, 1982.*

[68] *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report, State Clearinghouse No. 94071030, January 19, 1995, p. 2.17-4.*

[69] *Los Angeles Department of Public Works, Navigate LA, http://navigatela.lacity.org/navigatela/, accessed May 29, 2015.*

The Certified EIR for the Original Stadium Project concluded that impacts with respect to construction noise would be significant and unavoidable even with implementation of mitigation (refer to Section IV.G, Noise, of the Certified EIR). With regard to operational noise, the Certified EIR determined that noise associated with stadium events would be significant and unavoidable and that no feasible mitigation would reduce impacts below the applicable thresholds of significance, and that noise associated with traffic and parking lots would be less than significant.

Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide, the Certified EIR indicated that the Project would have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on Sunday.

The City of Los Angeles has not adopted any thresholds for groundborne vibration impacts. Therefore, the analysis in the Certified EIR used the Federal Railroad Administration's vibration impact threshold where an impact is considered significant if groundborne vibration from project construction activities exceeds 80 VdB at residences and buildings where people normally sleep.

Based upon the criteria established in the City of Los Angeles L.A. CEQA Thresholds Guide, the Certified EIR also indicated that the Original Stadium Project would have a significant impact on noise levels from Original Stadium Project operations if the project would increase the ambient noise levels by 3 dBA CNEL at the property line of homes where the resulting noise level would be at least 70 dBA CNEL or at the property line of commercial buildings where the resulting noise level would be at least 75 dBA CNEL. In addition, any long-term increase of 5 dBA CNEL or more was considered by the Certified EIR to cause a significant operational noise impact. The CNEL thresholds are generally used to evaluate noise impacts with respect to the off-site traffic noise, as the City of Los Angeles Noise Regulation (Chapter XI of the Los Angeles Municipal Code) does not apply to vehicles traveling on public roadways. In addition to the CNEL threshold, consistent with the City's Noise Regulation, the analysis of the Modified Project's potential

noise impacts uses an increase of 5 dBA measured in hourly L_{eq} as a threshold of significance to evaluate potential operational noise impacts at off-site sensitive receptors.

(a) Noise and Vibration Background

The Project Site is located in a highly urbanized environment. Primary noise sources in the vicinity include events at the Coliseum and the existing Sports Arena, traffic on the elevated Harbor Freeway (Interstate 110) located to the east of the Project Site, traffic on adjacent surface streets and the Exposition Light Metro Light Rail along Exposition Boulevard, which was planned but not yet operational at the time the Certified EIR was prepared. The passive recreational open spaces and outdoor play areas of the Exposition Park educational and museum facilities are also sources of noise in the vicinity of the Project Site.

To establish baseline noise conditions within the vicinity of the Project Site, existing daytime noise levels were documented in the Certified EIR by taking noise measurements at four locations during a non-event weekday. The monitoring locations are illustrated in Figure IV.G-1 on page IV.G-7 of the Certified EIR. The Project vicinity has not changed substantially since preparation of the Certified EIR. As such, the ambient noise levels in the immediate vicinity of the Project Site would be substantially similar to those recorded at the time of the Certified EIR was completed. Additional ambient noise measurements were conducted on May 28, 2015 for Receptor Location 3 (representing the land uses east of the Project Site across Figueroa Street), which confirmed that there are have been no substantial changes in the ambient noise levels identified in the Certified EIR (refer to the Noise Study in Appendix O of this Addendum). Therefore, the baseline ambient noise levels from the Certified EIR are used for the Modified Project noise analysis. Table 11 on page 122 provides the measured ambient noise levels at the receptor locations. As indicated therein, noise levels within the Project Site vicinity range from 57.9 dBA at the northern boundary of the Project Site (Receptor Location 2) to up to 76.3 dBA south of the Project Site along Martin Luther King, Jr. Boulevard (Receptor Location 4).

The noise-sensitive receptors within the vicinity of the Project Site include residential uses located east of Figueroa Street (which are accessed from S. Flower Drive), and residential uses located south of Martin Luther King, Jr. Boulevard between Figueroa Street and Menlo Avenue. Noise-sensitive uses in Exposition Park also include museums and the educational facilities. To provide a conservative analysis of construction noise impacts, the open space areas in Exposition Park west and north of the Sports Arena (Receptor Locations 1 and 2, respectively) were considered noise-sensitive uses. As the area within Exposition Park to the north of the Sports Arena (i.e., open space area within Christmas Tree Lane) currently includes outdoor events and gatherings, it is not considered sensitive to noise from the Modified Project's operational outdoor events and gatherings.

Table 11
Existing Ambient Noise Levels

Receptor Location[a]	Description of Receptor	Measured Ambient Noise Levels, dBA L_{eq}
1[a]	Near Southwest corner of Project Site (representing the Ralph M. Parsons Pre-School located within the Expo-Center)	60.4
2[b]	Northern-central boundary of Project Site (representing the open space area north of the Sports Arena)	57.9
3[c]	Residential uses east of Figueroa Street (which are accessed from S. Flower Drive), east of Project Site	67.4
4	Residential use on Martin Luther King, Jr. Boulevard (west of Figueroa Street), south of Project Site	76.3

[a] *The four receptor locations are the same as those set forth in the Certified EIR. Note that the Certified EIR inadvertently switched the order of Receptor Locations 1 and 2 in the construction noise analysis provided in Table IV.G-6 on page IV.G-12.*

[b] *Receptor Location 2 at the Northern-central boundary of the site is evaluated for the construction noise impact analysis only as this location is regularly used for events and gatherings and is thus, not a noise-sensitive receptor relative to outdoor events and gatherings within the Project Site.*

[c] *Tables IV.G-6 and IV.G-8 of the Certified EIR described the land uses represented by Receptor Location 3 as residential uses located on the east side of Figueroa Street because they are visible from Figueroa Street. However, these residential uses are located on S. Flower Drive (east of Figueroa Street).*

Source: Los Angeles Memorial Sports Arena Redevelopment Project, Draft Environmental Impact Report, November 2010.

With regard to existing groundborne vibration, the typical sources of groundborne vibration in the vicinity of the Project Site are roadway truck traffic and buses. These vehicles typically generate groundborne vibration velocity levels of approximately 63 vibration decibels (VdB), with levels reaching 72 VdB where the vehicles pass over bumps in the road.

(b) Construction Noise and Vibration Impacts

(i) On-Site Construction Activities

As set forth in the Certified EIR, construction of the Original Stadium Project would generate noise from the following construction-related activities and sources: demolition and site clearing, grading and site preparation; building construction; paving and asphalting; construction workers traveling to and from the Project Site; and delivery and hauling of construction supplies and debris to and from the Project Site. As set forth in the Certified EIR, under the Original Stadium Project, off-site construction noise levels would

range from 67.9 dBA L_{eq} near the southwest corner of the Project Site to 83.1 dBA L_{eq} at the northern boundary of the Project Site. When compared with the existing ambient noise environment, construction activities associated with the Original Stadium Project would result in a temporary or periodic increase in noise levels at the off-site noise sensitive receptor locations near the southwestern corner of the Project Site (Receptor Location 1) and near the northern boundary of the Project Site (Receptor Location 2). While Mitigation Measures MM G-1 through MM G-4 would reduce the impacts to the maximum extent feasible, such impacts would remain significant and unavoidable.

It is anticipated that the types of construction equipment that would be used for construction of the Modified Project would be similar to those used for the Original Stadium Project. A detailed construction noise model was created in the Noise Study included in Appendix O of this Addendum to calculate the construction-period noise levels at the off-site sensitive receptors, using the construction equipment reference noise levels provided by the Federal Highway Administration (FHWA).[70] The average (hourly L_{eq}) noise level associated with each construction phase is calculated based on the anticipated quantity and type of equipment that would be used during each construction phase. Table 12 on page 124 provides the estimated construction noise levels for various construction phases at the Project Site's off-site noise-sensitive receptors. To represent the maximum construction noise levels at the off-site sensitive receptors, all construction equipment was assumed by the Noise Study to operate simultaneously and was assumed to be located at the construction area nearest to the affected receptors. As indicated in Table 12, the estimated construction-related noise would exceed the significance threshold (existing ambient plus 5 dBA) at the noise-sensitive uses located near the southwest corner of the Project Site (Receptor Location 1) and at the northern boundary of the Project Site (Receptor Location 2), similar to the Original Stadium Project. Mitigation Measures G-1 through G-4 set forth in the Certified EIR would reduce these impacts to the maximum extent feasible. However, as with the Original Stadium Project, such impacts would continue to be significant and unavoidable.

(c) Off-Site Construction Noise

As set forth in the Certified EIR, the projected haul route that would be used by haul and delivery trucks for the Original Stadium Project was anticipated to be east/west bound on Martin Luther King, Jr. Boulevard to/from the Project Site utilizing the Interstate 110 (I-110) Freeway. In addition, a secondary haul truck route for the Modified Project may use Figueroa Street to Martin Luther King, Jr. Boulevard and then to the I-110 Freeway. The Certified EIR concluded that the noise levels generated by construction trucks would be

[70] *FHWA Roadway Construction Noise Model User's Guide, 2006.*

Table 12
Estimated Project Construction Noise Levels

Receptor Location	Approximate Distance to Project Construction Area (feet)	Estimated Construction Noise Levels by Phases, dBA L_{eq}					Significance Threshold[a] dBA L_{eq}
		Abatement/ Soft Demolition	Structure Demolition	Grading	Building Construction	Site Finishes	
1—Near Southwest Corner of Project Site	400	60.0	69.0	70.6	67.6	66.1	65.4
2—Near Northern-central Boundary of Project Site	50	78.0	82.7	84.5	82.6	82.7	62.9
3—Residential uses East of Figueroa Street	250[b]	64.1	70.2	72.1	69.7	70.8	72.4
4—Residential uses on Martin Luther King, Jr. Boulevard	325[c]	61.8	69.8	71.8	68.3	75.4	81.3

[a] *Significance threshold is equal to the measured ambient noise levels plus 5 dBA.*

[b] *Construction activities for most of the construction phases would be a minimum 250 feet from Receptor Location 3. However construction for the site finishing phase would occur within approximately 215 feet from Receptor Location 3. This distance was accounted for in the data within this table.*

[c] *Construction for the site finishing phase would occur within approximately 115 feet from Receptor Location 4. This distance was accounted for in the data within this table.*

Source: AES, 2015.

substantially similar to the existing noise levels generated by other buses, trucks, and automobiles along the haul route and as such, determined that off-site construction noise impacts would be less than significant.

As discussed in detail in the Noise Study, to present a worst-case scenario for the Modified Project, the off-site construction noise analysis is based on the construction phase with the maximum number of construction trucks. Based on an 11-hour work day and even distribution of haul trucks, there would be approximately 36 haul truck trips and 35 worker trips (based on the A.M. peak hour). The estimated noise level from Project construction-related truck and worker traffic would be 67.6 dBA L_{eq} at the residential uses along Martin Luther King, Jr. Boulevard (between the Project Site and the I-110 freeway) and 60.7 dBA at the residential uses east of Figueroa Boulevard. These noise levels would be below existing ambient noise levels for both the projected haul route and the secondary haul route. Therefore, similar to the Original Stadium Project, noise impacts associated with off-site construction under the Modified Project would be less than significant. No mitigation measures are required.

(d) Construction Vibration

As set forth in the Certified EIR, vibration levels associated with construction of the Original Stadium Project could reach as high as approximately 87 VdB within 25 feet of the Project Site from the operation of construction equipment. The nearest sensitive uses would not experience construction related vibration levels above 78.1 VdB. Consequently, the vibration level that would be experienced by these uses would not exceed the Federal Transit Administration's (FTA) vibration impact thresholds, and construction vibration impacts would be considered less than significant.

The vibration analysis for the Modified Project provided in this Addendum conservatively used the closest distance to construction activity and the construction phase with the equipment mix that would result in the greatest potential vibration. Under the Modified Project, the closest receptor to construction activities would continue to be Receptor Location 2 north of the Project Site. Based on an approximate distance of 50 feet, the construction-related vibration level at this location would be approximately 78 VdB, similar to the Original Stadium Project. This vibration level is less than the FTA's vibration impact threshold. Therefore, ground-borne vibration impacts associated with Modified Project construction would also be less than significant, consistent with the analysis of the Original Stadium Project. No mitigation measures are required.

(e) Operational Noise

(i) Stadium Use

Operational noise sources contemplated and evaluated under the Certified EIR included crowd noise (particularly yells and cheers at high attendance events), a public address system (amplified public announcements and/or play-by-play announcements), amplified concert music, traffic-related noise, and helicopters and other aircraft covering the events. As set forth in the Certified EIR, the noise levels during soccer games and related sporting events would be substantially similar to the peak noise generating events currently occurring at the Coliseum. However, noise levels generated during concert and related events that would involve the use of amplified music and announcements would be increased compared to existing conditions and could have the potential to adversely impact neighboring uses to the east and south of the Project Site. Accordingly, the Certified EIR determined that concert noise would exceed ambient conditions by five decibels at adjacent residential adjacent areas during off-peak traffic times when ambient noise levels in surrounding communities are lower. Therefore, operational noise impacts from stadium events were determined to be significant. The Certified EIR concluded that no feasible mitigation has been identified to reduce the noise level below the applicable significance threshold, and therefore that impacts from stadium events would be significant and unavoidable.

Under the Modified Project, noise impacts associated with the stadium use including MLS soccer games, concerts, and community events would be similar to those analyzed in the Certified EIR for the Original Stadium Project. Thus, noise associated with the stadium use, including crowd noise including yelling and cheering at high attendance events and the public address system, would also exceed the ambient levels at the off-site sensitive uses by 5 dBA or more. Therefore, as with the Original Stadium Project, impacts associated with stadium operations under the Modified Project (i.e. related to concerts, crowd noise including yelling and cheering, a public address system, amplified music, and announcements) would also be significant. No feasible mitigation measures have been identified to reduce the noise level below the applicable significance threshold, and therefore impacts would remain significant and unavoidable.

While not specifically discussed in the Certified EIR for the Original Stadium Project, during existing events held at the Sports Arena, crowds gather in the parking areas and outdoor spaces immediately surrounding the Sports Arena before or after an event when entering and exiting the stadium. The Modified Project's use of outdoor spaces is anticipated to be similar to the existing conditions on an event day. As part of the Noise Study, an analysis was conducted of use of the Modified Project's outdoor spaces including the Northwest Plaza (e.g., the outdoor dining/seating areas), rooftop terraces (e.g., seating areas, gathering spaces, water features (such as a reflection pool or pool), and art), and the outdoor spaces along the northern and eastern side of the Project Site with people gathering and talking before or after an event. The Noise Study estimated that up to 22,000 people could gather within these outdoor spaces, which is the maximum capacity of the Modified Project stadium. As discussed in Section IIII.C, Modified Project Description, above, and pursuant to Project Design Feature O-4 in Section IV.O, Traffic/Transportation/ Parking, on event days the Ancillary Uses proposed as part of the Modified Project would be open only to ticket-holding game/event patrons during a period of time before, during and after the game/event. Therefore, 22,000 represents a maximum number of people who could gather within the outdoor spaces at the Project Site on an event day. While a total of 22,000 people were analyzed, this represents a conservative worst-case analysis because all game/event patrons are not anticipated to utilize the outdoor spaces at once.

Reference noise levels of 75 dBA and 71 dBA (L_{eq} at a distance of 3.3 feet) for a male and a female speaking in a loud voice, respectively, were used for analyzing noise from the use of these outdoor areas surrounding the Modified Project.[71] In order to analyze a typical noise scenario, it was assumed that up to 50 percent of the people (half of which would be male and the other half female) would be talking at the same time. Table 3 of the

[71] *Handbook of Acoustical Measurements and Noise Control, Table 16.1, Cyril M. Harris, Third Edition, 1991.*

Noise Study presents the estimated noise levels from simultaneous use of the outdoor spaces at the off-site sensitive receptors. As indicated in the Table 3 of the Noise Study, the estimated noise levels at the off-site sensitive uses would be below the significance threshold of 5 dBA L_{eq} above ambient noise levels. Thus, potential impacts associated with the use of the outdoor spaces during an event day would be less than significant and no mitigation measures would be required.

Use of Project Site During Non-Event Days

The Modified Project includes approximately 105,900 square feet of Ancillary Use floor area, including office and conference facility space, a "World Football" museum, a team store and other retail space, and restaurants (including outdoor dining). Most of the Ancillary Uses would be centered around the stadium's main entry plaza at the northwest corner of the Project Site (Northwest Plaza), which would also contain outdoor seating and gathering space, and thus would be shielded from the off-site residential uses to the east and south of the Project Site. In addition, the Modified Project would provide a 40- to 70-foot setback along Figueroa Street to activate the pedestrian realm. This area would be developed as a broad, landscaped sidewalk to provide sufficient space for patrons to circulate and queue on event days, and to provide an inviting and safe pedestrian environment on non-event days. Additionally, up to 3,975 sf of retail and restaurant use floor area could be located along the stadium's Figueroa Street frontage.

Noise sources at the Northwest Plaza (e.g., the outdoor dining/seating areas), rooftop terraces (e.g., seating areas, gathering spaces, water features (such as a reflection pool or pool), and art) and the outdoor spaces along the northern and eastern side of the Project Site would include people gathering and talking and the use of an outdoor amplified sound system. Use of the outdoor areas could occur seven days a week with potential hours of operation until 2:00 A.M. For an event day an analysis was conducted of 22,000 people gathering in these outdoor spaces. To provide a conservative analysis, the analysis of a non-event day added the use of an outdoor amplified sound system to the analysis of people gathering in the outdoor spaces on an event day. Consistent with the event day analysis, it was estimated that up to 22,000 people could gather at the outdoor spaces, which is substantially higher than the number of people anticipated on the Project Site on non-event days. The same assumptions regarding reference noise levels and persons talking that were used in the event day outdoor gathering noise analysis above were used for the non-event day. In addition, in accordance with Project Design Feature L-1, the amplified program sound system would be designed so as not to exceed a maximum noise level of 85 dBA L_{eq} and 75 dBA L_{eq} at a distance of 50 feet within the Northwest Plaza and the Figueroa Street frontage, respectively. Table 13 on page 128 presents the estimated noise levels from simultaneous use of the outdoor spaces at the off-site sensitive receptors with the amplified program sound system described above. As indicated in Table 13, the

Table 13
Noise Levels from Outdoor Areas During Non-Event Day

Receptor Location[a]	Existing Ambient Noise Levels, dBA L_{eq}	Estimated Noise Levels from Outdoor Uses dBA L_{eq}	Ambient Plus Outdoor Uses Noise Levels, dBA L_{eq}	Significance Threshold,[b] dBA L_{eq}
1—Near Southwest Corner of Project Site	60.4	62.9	64.9	65.4
3—Residential Uses East of Figueroa Street	67.4	69.7	71.7	72.4
4—Residential uses South of Martin Luther King, Jr. Boulevard	76.3	63.8	76.5	81.3

[a] *Receptor Location 2 to the north of the Project Site is not a sensitive receptor relative to operations as this receptor currently includes outdoor events and gatherings.*

[b] *Significance threshold is equal to the measured ambient noise levels plus 5 dBA.*

Source: AES, 2015.

estimated noise levels at the off-site sensitive uses on non-event days would be below the significance threshold of 5 dBA L_{eq} above ambient noise levels. Thus, potential impacts associated with the use of the outdoor spaces on non-event days, along with an amplified program sound system complying with Project Design Feature L-1, would be less than significant and no mitigation measures would be required.

VIP Parking Lot

As set forth in the Certified EIR, the Original Stadium Project would not increase the maximum size of the events currently held at the existing Sports Arena. Combined with the Coliseum, the Project Site currently holds events ranging from 500 to 93,000 people in attendance. Events and attendance proposed at the new event/soccer stadium facility are within the purview of the existing operations of the Sports Arena and the Coliseum and would not result in an increase in the number of people (or motor vehicles) for individual events at the Sports Arena. Accordingly, parking related noise would not be increased as a result of the Original Stadium Project as compared to existing conditions. Thus, parking-related noise impacts under the Certified EIR were concluded to be less than significant.

Under the Modified Project, the existing VIP parking lot west of the stadium would be reconfigured and re-landscaped to provide a secure, VIP parking lot with up to approximately 250 parking spaces. The parking lot would be surrounded by a perimeter

fence and gates and accessed from South Coliseum Drive, similar to existing conditions. The proposed VIP parking lot would be similar to that set forth under the Original Stadium Project, and for the reasons described above and in the Certified EIR, would result in less than significant noise impacts. No mitigation measures are required.

Loading Dock Activities

While not specifically evaluated in the Certified EIR for the Original Stadium Project, noise associated with the loading dock activities would not increase the ambient noise levels at the off-site noise sensitive uses due to the sound attenuation provided by the relatively long distances and intervening structures between the sensitive off-site uses and the loading dock. As such impacts associated with use of the loading dock under the Original Stadium Project would be less than significant. The Modified Project could include both above-grade and below-grade loading docks, which would be located within the northwest portion of the Project Site along the southern and western perimeters of the Ancillary Uses, respectively. The nearest residences to the south and to the east would be at least approximately 615 feet and 900 feet, respectively, from the above-grade loading dock (which has the greater potential to generate noise that could be heard at nearby sensitive receptors). As stated in the Noise Study, noise levels would be approximately 65 dBA L_{eq} at a distance of 100 feet, based on measured noise levels from other loading dock facilities. Based on this reference noise level, distance attenuation, and intervening structures, loading dock noise levels at Receptor Location 4 (to the south) and Receptor Location 3 (to the east) would be approximately 39 dBA L_{eq} and 36 dBA, respectively, which would be well below the measured ambient noise levels. Furthermore, the above-grade loading dock would be shielded from the off-site sensitive receptors to the east (Receptor Location 3) by the new stadium structure and the off-site sensitive receptors to the south (Receptor Location 4) by part of the Ancillary Uses structure. Additionally, the majority of the loading activities would occur at the below-grade loading docks. Therefore, noise impacts associated with loading dock operations under the Modified Project would be less than significant and no mitigation measures would be required.

(e) Off-Site Traffic

As discussed above and in the Certified EIR, the Original Stadium Project would not increase the maximum size of the events currently held at the Project Site in the existing Sports Arena. Accordingly, the number of vehicles and vehicular-related noise would not be increased as a result of the Original Stadium Project. Thus, traffic noise impacts evaluated the Certified EIR were concluded to be less than significant.

As set forth in the Modified Project Transportation Report included as Appendix P-1 of this Addendum, similar to the Original Stadium Project, the Modified Project would not generate substantial additional traffic on an event day. Therefore, as with the Original

Stadium Project, noise impacts from off-site traffic on event days would be less than significant under the Modified Project.[72] However, the proposed Ancillary Uses do not currently exist on the Project Site and were not included as part of the Original Stadium Project. Therefore, noise impacts associated with the off-site traffic generated from the Ancillary Uses on a non-event day have been analyzed based on the traffic volumes provided in the Modified Project Transportation Report. As provided in the Modified Project Transportation Report, the Ancillary Uses are estimated to generate approximately 2,615 daily trips on a non-event day. As such, Modified Project-related traffic would increase the existing traffic volumes along the roadway segments in the vicinity of the Project Site when compared with "Future (2018) Without Project" conditions set forth in the Modified Project Transportation Report (see Appendix P-1 of this Addendum). This increase in roadway traffic was analyzed to determine if any traffic-related noise impacts would result from the Ancillary Uses.

Twenty (20) roadway segments were selected to evaluate potential traffic noise impacts. These segments were selected based on proximity to noise-sensitive uses along the roadway segments and potential increases in traffic volumes from the Modified Project. Traffic noise levels were calculated using the Federal Highway Administration (FHWA) Traffic Noise Model (TNM) and traffic volume data from the Modified Project Transportation Report. The TNM traffic noise prediction model calculates the hourly L_{eq} noise levels based on specific information including the hourly traffic volume, vehicle type mix, vehicle speed, and lateral distance between the noise receptor and the roadway. To calculate the 24-hour CNEL levels, the hourly L_{eq} levels were calculated during daytime hours (7:00 A.M. to 7:00 P.M.), evening hours (7:00 P.M. to 10:00 P.M.), and nighttime hours (10:00 P.M. to 7:00 A.M.). To determine the Modified Project-related noise impacts, the roadway noise conditions under "Future (2018) Without Project" conditions set forth in the Modified Project Transportation Report (see Appendix P-1 of this Addendum) were calculated and compared to noise levels that would occur with implementation of "Future (2018) Plus Project" conditions set forth in the Modified Project Transportation Report.

Table 5 of the Noise Study provides the calculated off-site roadway noise levels in the vicinity of the Project Site for the Future (2018) Without Project and Future (2018) Plus Project conditions. The calculated CNEL levels are applicable to the front of the roadways and do not account for the presence of any physical sound barriers or intervening structures. As shown in Table 5, traffic from the Ancillary Uses would result in a maximum increase of up to 0.1 dBA (CNEL) at some of the roadway segments. The 0.1-dBA

[72] *As discussed in Section III.C, Modified Project Description, above, on event days the Ancillary Uses proposed as part of the Modified Project would be open only to ticket-holding game/event patrons during a period of time before, during and after the game/event. Therefore, the traffic associated with an event day would be substantially similar to that of the Original Stadium Project.*

increase in traffic noise levels is considered negligible and would be well below the 3-dBA significance threshold (applicable when noise level falls within the normally unacceptable category; i.e., 70 CNEL or greater at noise-sensitive uses). Therefore, off-site traffic noise impacts associated with the Ancillary Uses would be less than significant. Thus, similar to the Original Stadium Project, noise impacts associated with off-site roadways under the Modified Project would be less than significant. No mitigation measures are required.

The Modified Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. Cumulative noise impacts due to off-site traffic were analyzed by comparing the projected increase in traffic noise levels from Existing conditions to Future Plus Project conditions to the applicable significance criteria. Future cumulative conditions include traffic volumes from future ambient growth, related projects, and the Modified Project. The calculated traffic noise levels under Existing and Future Plus Project conditions are presented in Table 6 of the Noise Study. As shown therein, cumulative traffic volumes would result in a maximum increase of 0.6 dBA CNEL along Figueroa Street (north of Exposition Avenue). The estimated cumulative noise increase would be below the 3-dBA significance threshold. Therefore, cumulative noise impacts due to off-site mobile noise sources associated with the Modified Project, future growth, and related projects would be less than significant. No mitigation measures are required.

(f) Conclusion

In summary, consistent with the conclusion in the Certified EIR for the Original Stadium Project (refer to IV.G, Noise, of the Certified EIR), impacts with respect to construction noise and operational stadium event noise (i.e., related to concerts, crowd noise including yelling and cheering, a public address system, amplified music, and announcements) would continue be significant and unavoidable under the Modified Project. In addition, as set forth above, impacts associated with the outdoor uses on a non-event day, including use of the Northwest Plaza and the Figueroa Street frontage, and traffic and parking noise would be less than significant under the Modified Project. Therefore, the Modified Project would not result in any new significant impacts with respect to noise, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(g) Mitigation Measures

The Certified EIR included code required measures and mitigation measures to mitigate the Original Stadium Project's noise impacts to the extent feasible. These code required measures and mitigation measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP included with this Addendum (see Appendix A of this Addendum), with the revisions indicated below to reflect

the design characteristics of the Modified Project. It should be noted that the exterior construction hour restrictions established for the Original Stadium Project by code required measure CR G-2 in the Certified EIR, which would also apply to the Modified Project, are more restrictive than the construction hour noise regulations currently set forth in Section 41.40 of the LAMC, which prohibit construction activities before 7:00 A.M. and after 9:00 P.M. Monday through Friday, before 8:00 A.M. and after 6:00 P.M. on Saturday or on a national holiday, and at any time on Sunday.

(i) Code Required Measures

CR G-1: The Applicant shall comply with the ~~City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances~~ LAMC, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

CR G-2: The Applicant shall ensure exterior construction and demolition activities are limited ~~be restricted~~ to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday.

(ii) Project Design Features

PDF L-1: During non-event days, the amplified program sound system shall be designed so as not to exceed a maximum noise level of 85 dBA L_{eq} and 75 dBA L_{eq} at a distance of 50 feet within the Northwest Plaza and the Figueroa Street frontage, respectively.

(iii) Project-Specific Mitigation Measures

MM G-1: The Applicant shall prepare a ~~construction-related traffic plan~~ Construction Management Plan detailing proposed haul routes and staging areas for the transportation of materials and equipment, with consideration for sensitive uses in the neighborhood. ~~A traffic and parking plan for the construction phase will~~ The Construction Management Plan shall be submitted for approval by LADOT and the Department of Building and Safety prior to the issuance of any permits. The Construction Management Plan shall include the following requirements:

- The preferred haul route to and from the Project Site shall be Martin Luther King, Jr. Boulevard to and from the Harbor Freeway. Trucks shall not be permitted to travel along local residential streets.
- A flagman shall be placed at the truck entry and exit from the Project Site onto Martin Luther King, Jr. Boulevard to control the flow of exiting trucks.

- Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods to the degree possible and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.
- Access shall remain unobstructed for land uses in proximity to the Project Site during construction of the Modified Project.
- In the event of a lane or sidewalk closure, a worksite traffic control plan, approved by the City of Los Angeles, shall be implemented to route traffic or pedestrians around any such lane or sidewalk closures.
- The locations of truck staging shall be identified and measures shall be included to ensure that trucks use the specified haul route and do not travel through nearby residential neighborhoods.
- Vehicle movements shall be scheduled to minimize vehicles waiting off-site and impeding public traffic flow on the surrounding streets.
- Requirements shall be established for the loading, unloading, and storage of materials on the Project Site.
- Requirements shall be established for the temporary removal of parking spaces, time limits for the reduction of travel lanes, and closing or diversion of pedestrian facilities to ensure the safety of pedestrian and access to local businesses.
- The Applicant shall coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.
- If the construction periods for the Modified Project and the My Figueroa street improvement project overlap, the Applicant shall coordinate with the City to minimize the potential combined effects of the two projects to the extent possible.

MM G-2: The Applicant shall ensure all construction equipment engines be properly tuned and muffled according to manufacturers' specifications. For example, Table IV.G-6 in the Certified EIR indicates that noise levels of 82 dBA at 50 feet could be reduced to a noise level of 76 dBA at 100 feet with the proper use of mufflers.

MM G-3: Adjacent museums and residents shall be given regular notification of major construction activities and their durations. A visible and readable sign (at a distance of 50 feet) shall be posted on the construction site identifying a telephone number where residents can inquire about the construction process and register complaints.

MM G-4: The perimeter of the Project Site shall be enclosed with a temporary barrier wall for security and noise protection purposes during project construction. This barrier wall shall consist of a solid, heavy vinyl material or 0.75-inch plywood positioned to block direct line of sight from the active construction areas and other open space areas and sensitive uses.

M. Population, Housing, and Employment

The Certified EIR for the Original Stadium Project concluded that impacts with respect to population, housing, and employment would be less than significant under the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR). Significant impacts with respect to population, housing, and employment could occur if a project were to displace existing housing or residents, or induce substantial population growth (either directly or indirectly). As stated in the Certified EIR, there are no residential uses on the Project Site, and the Original Stadium Project did not propose residential uses. Therefore, the Original Stadium Project would not have displaced existing housing or provided additional housing capacity. Similarly, the Modified Project would neither displace residential uses, nor provide additional housing capacity. Rather, the Modified Project involves the development of the Original Stadium Project with certain modifications that include additional Ancillary Uses that are all commercial land uses that would complement the proposed stadium.

As described in the Certified EIR, construction of the Original Stadium Project would result in an increase in employment opportunities and related demand for housing. However, the work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, due to the temporary nature of construction employment opportunities, the Certified EIR stated that it is unlikely that construction workers would relocate their households as a consequence of construction employment associated with the Original Stadium Project; therefore, no new permanent residents would be generated as result of the construction of the Original Stadium Project. This conclusion would not change under the Modified Project. While the Modified Project proposes the construction of up to approximately 105,900 square feet of floor area for the Ancillary Uses in addition to the proposed stadium, the amount of additional construction work involved would not require substantial numbers of additional construction workers. In total, approximately 1,200 construction workers are projected for construction of the Modified Project.[73] In May 2015, there were approximately 119,600

[73] *Based on information provided by the Project Applicant.*

workers employed in the construction industry in Los Angeles County.[74] Therefore, the Modified Project's projected construction workforce could be accommodated by the existing regional supply of construction workers.

With respect to employees generated during operation, the Certified EIR concluded that implementation of the Original Stadium Project would not result in a substantial change in employment levels at the Project Site because the Original Stadium Project would redevelop the Project Site with the same general use (i.e., sports stadium) that currently exists on-site. Therefore, the Certified EIR concluded that any additional employment opportunities created by the Original Stadium Project would not result in a significant indirect impact on housing supply or demand in the Project area. As is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of 22,000 seats. Therefore, employment impacts with respect to the stadium operations of the Modified Project would not change. However, additional employees beyond those anticipated in the Certified EIR may result from operation of the Ancillary Uses proposed as part of the Modified Project. Specifically, as shown in Table 14 on page 136, conservatively assuming that all employees associated with the Ancillary Uses would be new to the Project Site and the Project vicinity, the Modified Project's 105,900 square feet of Ancillary Uses would generate as many as 282 employees on-site, based on employee generation rates for non-residential land uses promulgated by the Los Angeles Unified School District (LAUSD).[75]

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG's 2012–2035 RTP/SCS provides population, housing, and employment projections for cities under its jurisdiction through 2035. The growth projections in the 2012–2035 RTP/SCS reflect the 2010 Census, employment data from the California Employment Development Department (EDD), population and household data from the California Department of Finance (DOF), and extensive input from local jurisdictions in SCAG's planning area. The Project Site is located in SCAG's City of Los Angeles Subregion. According to the 2012–2035 RTP/SCS, the employment forecast for the City of Los Angeles Subregion in 2015 is approximately 1,809,341 employees. In 2018, the projected build-out year of the Modified Project, the City of Los Angeles Subregion is anticipated to have approximately

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[74] *State of California, Employment Development Department, Employment By Industry Data, Los Angeles County (Los Angeles-Long Beach-Glendale MD), May 2015, www.calmis.ca.gov/file/lfmonth/la$pds.pdf, accessed June 30, 2015.*

[75] *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11.*

Table 14
Additional Employees Potentially Generated by the Modified Project

Land Use	Size (sf)	Employee Generation Factor (employees/sf)	Employees Generated
Conference Facilities	9,000	0.00271	24
Office	21,250	0.00479	102
Museum	36,000	0.00135	49
Team Store and Other Retail	27,750	0.00271	75
Restaurant	11,900	0.00271	32
Total			**282**

sf = square feet

Source: Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 9, 2012, Table 11. Conservatively based on employee generation rates for "Neighborhood Shopping Center" uses (0.00271 employees per average square foot),"Standard Commercial Office" uses (0.00479 employees per average square foot), and "Industrial Park" uses (0.00135 employees per average square foot).

1,840,552 employees.[76] Thus, the 282 estimated on-site employees for the Modified Project's Ancillary Uses would constitute approximately 0.9 percent of the employment growth forecasted for the Subregion between 2015 and 2018. In July 2015, the unadjusted unemployment rate for the County of Los Angeles was 7.5 percent.[77] The California seasonally adjusted unemployment rate was 6.2 percent in July 2015, 6.3 percent in June 2015, and 7.4 percent in July 2014. Thus, the additional part-time and full-time jobs created by the Modified Project would be considered a beneficial economic impact for the region, and the, additional employees generated by the Modified Project would fall within SCAG's employment projections for the Subregion. Furthermore, the estimated number of new employees would not be anticipated to induce substantial indirect population or housing growth in the Project area, as it is anticipated that the majority of Modified Project employees would come from the existing local labor pool and would not relocate as a result of working at the Project Site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section V, General Impact Categories, of the Certified EIR), impacts with respect to population, housing, and employment would be less than significant under the Modified Project. Accordingly, the Modified Project would not result in any new significant impacts with respect to population, housing, and employment,

[76] *Based on a linear interpolation of 2015–2020 data.*

[77] *State of California, Employment Development Department, Labor Market Information Division, August 21, 2015.*

and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

N. Public Services

(a) Fire Protection

Potential impacts to fire protection services during construction were not assessed in detail in the Certified EIR. Significant impacts to fire protection services could occur if construction of a project were to require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Construction activities have the potential to result in accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, Modified Project construction managers and personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) specific to construction would be maintained on-site during Modified Project construction. Furthermore, construction of the Modified Project would occur in compliance with all applicable federal, State, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with applicable regulatory requirements would effectively reduce the potential for construction activities under the Modified Project to expose people to the risk of fire or explosion related to hazardous materials. With the implementation of these regulatory requirements, the Modified Project's potential impacts with respect to fire services during construction would be less than significant. No mitigation measures are required.

The Certified EIR for the Original Stadium Project concluded that potential operational impacts related to fire protection service would be mitigated to a less-than-significant level under the Original Stadium Project with implementation of Mitigation Measures H.1-1 through H.1-12 in the Certified EIR (refer to Section IV.H.1, Public Services—Fire Services, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.H-4 of the Certified EIR. As discussed in the Certified EIR, the Los Angeles Fire Department (LAFD) provides fire protection services to the Project Site. The LAFD focuses on the following metrics in assessing a project's potential demands on fire protection and emergency medical services: current equipment and staffing levels, emergency response times, fire flow requirements, and emergency access. Each of these topics is addressed below in the context of both the Original Stadium Project and the Modified Project to determine whether substantial changes have occurred since preparation of the Certified EIR.

As stated in the Certified EIR, three fire stations provide initial response to the Project Site, including Fire Station No. 46, located at 4370 S. Hoover Street, approximately 0.8 mile from the Project Site; Fire Station No. 15, located at 915 W. Jefferson Boulevard, approximately 0.9 mile from the Project Site; and Fire Station No. 14, located at 3401 S. Central Avenue, approximately 1.6 miles from the Project Site. These three stations continue to serve the Project Site and would be the first response stations under the Modified Project. At the time the Certified EIR was prepared, Fire Station No. 46 was equipped with an engine and two rescue ambulances. Fire Station No. 15 was equipped with an engine, an assessment light force,[78] and a paramedic ambulance. Fire Station No. 14 was equipped with a task force station,[79] engine and truck companies, and paramedic ambulances. Based on current data from the LAFD,[80] the equipment inventory at Fire Station No. 46 has been augmented to include a basic life support (BLS) rescue ambulance and an EMS battalion captain (in addition to the equipment listed above); the equipment inventory at Fire Station No. 15 has not changed; and the equipment inventory at Fire Station No. 14 has been restructured to include a paramedic rescue ambulance, a BLS rescue ambulance, and an assessment engine. Therefore, current equipment levels at the fire stations serving the Project Site are commensurate with the levels that were assessed in the Certified EIR.

Fire protection service to the Project Site was considered to be adequate at the time the Certified EIR was prepared, based on a comparison of existing service levels to Citywide response standards. Based on the most recent data available from the LAFD,[81] the average response time for emergency medical services (EMS) was 4 minutes and 4 seconds for Fire Station No. 46, 3 minutes and 35 seconds for Fire Station No. 15, and 3 minutes and 8 seconds for Fire Station No. 14. The Citywide average response time for EMS is 4 minutes and 9 seconds;[82] therefore, each station that serves the Project Site is currently achieving a response time that is less than the Citywide average, indicating that these stations continue to provide adequate service to the Project Site area. Furthermore, the response time for each station currently meets the national standard (i.e., nine minutes

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[78] *A "light force" includes a truck company with a single engine. See: Los Angeles Fire Department, Apparatus, http://lafd.org/about/apparatus, accessed June 17, 2015.*

[79] *A "task force" includes a truck company with two engines. See: Los Angeles Fire Department, Apparatus, http://lafd.org/about/apparatus, accessed June 17, 2015.*

[80] *Los Angeles Fire Department, Fire Station Directory, March 2014.*

[81] *Los Angeles Fire Department, FireStat LA, Fire Station Response Metrics, http://lafd.org/sites/default/files/pdf_files/05-12-2015_Stations.pdf, accessed June 2, 2015.*

[82] *Los Angeles Fire Department, FireStat LA, City-wide Response Metrics, http://lafd.org/sites/default/files/pdf_files/05-12-2015_CityWide.pdf, accessed June 5, 2015.*

for urban areas).[83] It should also be noted that since preparation of the Certified EIR, the LAFD has been reorganized into four geographic bureaus in an effort to reduce response times and improve performance.[84]

Fire flow requirements, as determined by the LAFD, vary by site as they are dependent on land use (e.g., higher intensity land uses require higher flow from a greater number of hydrants), life hazard, occupancy, and fire hazard level. As set forth in Section 57.507.3.1 of the LAMC, fire flow requirements vary from 2,000 gallons per minute (gpm) in low density residential areas to 12,000 gpm in high-density commercial or industrial areas, with a minimum residual water pressure of 20 pounds per square inch (psi) to remain in the water system. As stated in the Certified EIR, the LAFD-required fire flow for the Original Stadium Project is 6,000 gallons per minute (gpm) from four fire hydrants flowing simultaneously, which corresponds with the LAMC-required fire flow for industrial and commercial land uses. Based on information in the Certified EIR, a fire hydrant is located directly north of the Sports Arena on the west side of Figueroa Street and is connected to a 16-inch water main. In addition, two fire hydrants are located at the intersection of Martin Luther King, Jr. Boulevard and Figueroa Street, one on the southeast corner (connected to a 12-inch water main) and one on the southwest corner (connected to an 8-inch water main). The Certified EIR determined that, based on infrastructure present at the time, improvements to water system in the area could be necessary to meet the fire flow requirement of 6,000 gpm, and such improvements would be the responsibility of the developer. The Modified Project proposes the construction of a 22,000-seat MLS stadium, similar to the Original Stadium Project, in addition to approximately 105,900 square feet of commercial facility floor area (i.e., the Ancillary Uses). Thus, like the Original Stadium Project, the Modified Project would include exclusively commercial land uses. Based on its preliminary review of the Modified Project, the LAFD has not identified any substantial deficiencies in the fire flow infrastructure that serves the Project Site, or in the design of the Modified Project, that would prohibit the Modified Project from meeting applicable Fire Code requirements. Notwithstanding, as with the Original Stadium Project, the final fire-flow requirement for the Modified Project would be determined by the LAFD and the Applicant would be responsible for constructing any necessary infrastructure upgrades. The Modified Project would also implement Mitigation Measures H.1-2 through H.1-3 in the Certified EIR (with revisions proposed below to reflect amendments to the City's Fire Code that have occurred since the Certified EIR) which include requirements for the

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[83] *National Fire Protection Association (NFPA), NFPA 1720, www.nfpa.org/codes-and-standards/standards-development-process/safer-act-grant/nfpa-1720, accessed June 5, 2015.*

[84] *Los Angeles Fire Department, LAFD Implements New Bureau Command Structure, January 12, 2015, http://lafd.org/news/lafd-implements-new-bureau-command-structure, accessed June 12, 2015.*

provision of fire hydrants (see the MMP for the Modified Project included in Appendix A of this Addendum).

As discussed in the Certified EIR, emergency access to the Project Site is currently provided via public roadways located directly adjacent to the Project Site, including primary access from Martin Luther King, Jr. Boulevard to the south and Figueroa Street to the east. The Modified Project does not propose reconfiguration of any existing roadways within Exposition Park or in the surrounding area, and therefore emergency access to the Project Site would remain the same for the Modified Project. Additionally, the Modified Project would implement Mitigation Measures H.1-4 through H.1-11 in the Certified EIR to ensure that adequate access is provided to the Project Site (see the MMP for the Modified Project included in Appendix A of this Addendum). As stated in the Certified EIR, the three fire stations serving the Project Site have established response plans for the Sports Arena, and it is anticipated that these response plans would be carried over to the Modified Project along with any needed modifications. Pursuant to Section 57.507.3.3 of the LAMC, commercial and industrial land uses with a required fire flow of 6,000 to 9,000 gpm should be within one mile of an engine company and 1.5 mile of a truck company. If these response distances are exceeded, automatic sprinkler systems are required. Based on the information above, fire and emergency medical services for the Modified Project are available within acceptable response distances. Additionally, as stated above, based on its preliminary review of the Modified Project, the LAFD has not identified any substantial deficiencies in the fire flow infrastructure that serves the Project Site, or in the design of the Modified Project, that would prohibit the Modified Project from meeting applicable Fire Code requirements. Furthermore, as discussed below, the Modified Project would implement Mitigation Measure H.1-1 in the Certified EIR, which requires the installation of sprinkler systems (see the MMP for the Modified Project included in Appendix A of this Addendum).

As previously discussed, a project's potential demands on fire protection and emergency medical services are assessed based on current LAFD equipment and staffing levels, emergency response times, fire flow requirements, and emergency access. Based on the analysis above, current equipment levels at the fire stations serving the Project Site are commensurate with the levels that were assessed in the Certified EIR. Each station is currently achieving a response time that is less than the Citywide average and in compliance with the national standard for urban areas. Like the Original Stadium Project, the fire flow requirement for the Modified Project would be determined by the LAFD and the Applicant would be responsible for implementing any required improvements to the water system. Additionally, there would be no appreciable change to emergency access under the Modified Project. Furthermore, the Modified Project would be reviewed by the LAFD to ensure that it complies with applicable regulatory requirements related to fire protection and emergency medical services, including those contained within the LAMC, which

incorporates by reference California Building Code and Fire Code building construction standards as well as policies within the City of Los Angeles General Plan Safety Element. As stated above, based on its preliminary review of the Modified Project, the LAFD has not identified any substantial deficiencies in the fire flow infrastructure that serves the Project Site, or in the design of the Modified Project, that would prohibit the Modified Project from meeting applicable Fire Code requirements. Finally, the Modified Project would continue to implement Mitigation Measures H.1-1 through H.1-12 in the Certified EIR (with revisions proposed below to reflect amendments to the City's Fire Code that have occurred since the Certified EIR), which have been incorporated into the MMP for the Modified Project (see Appendix A to this Addendum). Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.H.1, Public Services—Fire Services, of the Certified EIR), operational impacts with respect to fire protection services would be less than significant under the Modified Project with implementation of Mitigation Measures H.1-1 through H.1-12 in the Certified EIR (as revised below), and no additional mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to fire services, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(i) Project Design Features and Mitigation Measures

The following mitigation measures were included in the Certified EIR to address the Original Stadium Project's potential impacts with respect to fire protection and emergency medical services. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP for the Modified Project included in Appendix A of this Addendum, but have been revised as follows to reflect amendments that were made to the City of Los Angeles Fire Code (Chapter V, Article 7 of the LAMC) after preparation of the Certified EIR pursuant to Ordinance No. 182,822 (effective January 10, 2014):

EIR Mitigation Measure MM H.1-1: Sprinkler systems ~~will~~ shall be required throughout any structure to be built, consistent with the LAMC requirements for public venue structures (Section 57.903~~09.07~~).

EIR Mitigation Measure MM H.1-2: All first-story portions of any commercial or industrial building must be within 300 feet of an approved fire hydrant (Section 57.507.3.2~~09.06, Subsection B-1~~).

EIR Mitigation Measure MM H.1-3: The maximum distance between fire flow hydrants on the roads and fire lanes in a high-density residential and commercial area is 300 feet.

EIR Mitigation Measure MM H.1-4: Any person owning or having control of any facility, structure, group of structures or premises shall provide and maintain Fire Department access (Section 57.4701.4~~09.03, Subsection A~~).

EIR Mitigation Measure MM H.1-5: If any portion of the first story exterior walls of any building structure is more than 150 feet from the edge of the roadway of an approved street, an approved fire lane shall be provided so that such portion is within 150 feet of the edge of the fire lane. (Section 57.503.1.4~~09.03, Subsection B.~~)

EIR Mitigation Measure MM H.1-6: When required access is provided by an improved street, fire lane or combination of both which results in a dead-end in access of 700 feet in length from the nearest cross street, at least one additional ingress-egress roadway shall be provided in such a manner that an alternative means of ingress-egress is accomplished (Section 57.503.1.5~~09.03, Subsection C~~).

EIR Mitigation Measure MM H.1-7: All public and private streets shall be dedicated and improved in conformance with Board of Public Works, Standard Dimension Plan, Number D-22549.

EIR Mitigation Measure MM H.1-8: Construction of public or private roadways in the proposed development shall not exceed 15 percent in grade.

EIR Mitigation Measure MM H.1-9: Fire lanes, where required, and dead ending streets, shall terminate in a cul-de-sac or other approved turning area.

EIR Mitigation Measure MM H.1-10: All access roads, including fire lanes, shall be maintained in an unobstructed manner. Removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than three square feet in area (Section 57.503.4.2~~09.05~~).

EIR Mitigation Measure MM H.1-11: Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width. The Fire Department may require additional vehicular access where buildings exceed 28 feet in height.

(b) Police Protection

The Certified EIR for the Original Stadium Project concluded that under the Original Stadium Project, potential impacts related to police protection service would be mitigated to a less-than-significant level with implementation of Mitigation Measures H.2-1 through H.2-3 in the Certified EIR (refer to Section IV.H.2, Public Services—Police Protection, of the Certified EIR). The thresholds on which this analysis was based are stated on

pages IV.H-9–IV.H-10 of the Certified EIR. As discussed in the Certified EIR, the Project Site is served by the Los Angeles Police Department's (LAPD) Southwest Area Police Station located at 1546 W. Martin Luther King, Jr. Boulevard, approximately 1.2 miles west of the Project Site. At the time the Certified EIR was prepared, staff at the Southwest Area Police Station included 347 sworn officers and 26 civilian support staff that served a population of 191,041 (or approximately one officer per 551 residents). The staff at this police station currently consists of 352 sworn personnel and 32 civilian personnel serving a population of approximately 165,000 (or approximately one officer per 469 residents).[85] Thus, the officer-to-resident ratio and staffing levels at the Southwest Area Police Station have improved since the preparation of the Certified EIR. Additionally, at the time the Certified EIR was prepared, the Southwest Area Police Station responded to 2,462 violent crimes and 6,038 property crimes annually. Based on current data from the LAPD, in 2014, the Southwest Area Police Station responded to 690 violent crimes and 2,128 property crimes.[86] Thus, crime levels in the Southwest Area Police Station service area have also decreased since the preparation of the Certified EIR.

As described in the Certified EIR, on-site construction activities could result in an increased demand for police protection services due to the potential for theft and vandalism at the Project Site. Thus, the Certified EIR includes Mitigation Measure H.2-1, which requires temporary fencing to properly secure the construction site. Given the similarity in construction duration and activities to the Original Stadium Project analyzed in the Certified EIR, the Modified Project would result in a similar demand for police protection services during construction. The Modified Project would also continue to implement Mitigation Measure H.2-1 as set forth in the Certified EIR, which has been incorporated into the MMP included in Appendix A of this Addendum. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.H.2, Public Services—Police Protection, of the Certified EIR), impacts with respect to police protection services during construction would be less than significant under the Modified Project with implementation of Mitigation Measure H.2-1 in the Certified EIR. No additional mitigation measures are required.

Like the Original Stadium Project, the Modified Project would introduce crowds of up to 22,000 people during an event day, which could increase the number of calls requesting police responses due to burglaries, damage to vehicles, traffic-related incidents, and crimes against persons. Under the Modified Project, maximum attendance on event days

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[85] *Los Angeles Police Department, About Southwest, www.lapdonline.org/southwest_community_police_station/content_basic_view/1639, accessed June 18, 2015.*

[86] *COMPSTAT, Southwest Area Profile, 05/10/15-06/06/15, http://assets.lapdonline.org/assets/pdf/sowprof.pdf, accessed June 18, 2015.*

would be the same as under the Original Stadium Project analyzed in the Certified EIR, since the Modified Project's proposed Ancillary Uses would only be open to ticket-holding patrons (refer to Project Design Feature O-4 in Section IV.O, Traffic/Transportation/ Parking, on page 169 of this Addendum). Thus, the anticipated demand for police protection services on event days would be substantially similar to that of the Original Stadium Project. While the Modified Project would result in a greater demand for police protection services on non-event days due to the operation of the Ancillary Uses, this demand would be far less than the demand on event days, and therefore within the service capabilities of the LAPD. Furthermore, the Modified Project would continue to implement Mitigation Measures H.2-2 to H.2-3 from the Certified EIR (as revised below to reflect the Modified Project's design characteristics) to further reduce impacts related to police services and ensure that impacts would remain less than significant both on event days and on non-event days (see the MMP for the Modified Project included in Appendix A of this Addendum). Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.H.2, Public Services—Police Protection, of the Certified EIR), impacts with respect to police protection services during operation would be less than significant under the Modified Project with implementation of Mitigation Measures H.2-2 and H.2-3 in the Certified EIR (as revised below). No additional mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to police protection services, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(i) Mitigation Measures

The following mitigation measures were included in the Certified EIR to address the Original Stadium Project's potential impacts with respect to police protection services. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP for the Modified Project included in Appendix A of this Addendum, but have been revised as follows to reflect the design characteristics of the Modified Project:

EIR Mitigation Measure H.2-1: The ~~Project~~ Applicant shall erect temporary fencing around the Project Site during construction activities to secure the Project Site and discourage trespassers.

EIR Mitigation Measure H.2-2: Event Sponsors at the Project Site shall employ private security guards to monitor and secure the Project Site during events and deter any potential criminal activity.

EIR Mitigation Measure H.2-3: The ~~Project~~ Applicant shall develop and implement a Security Plan in consultation with the LAPD outlining the security

services and features to be provided in conjunction with the ~~Approved~~ Project. The plan shall be coordinated with the LAPD and a copy of the said plan shall be filed with the LAPD Central Bureau commanding Officer. Said security plan may include some or all of the following components:

i. Provisions for an on-site private security force ~~for the mixed-use trade school. Through individual lease agreements for the proposed trade school/retail uses, private on-site security services~~ that shall provide 24-hour presence. Security officers shall be responsible for patrolling all common areas including the back service corridors and ~~alleys~~ walkways, parking ~~garages~~ lots, and stairwells.

ii. ~~The parking garage~~ The VIP parking lot on the Project Site shall be fitted with emergency features such as closed circuit television (CCTV) or emergency call boxes that would provide a direct connection with the on-site security force or the LAPD 911 emergency response system.

iii. The proposed security shall incorporate low level and directional lighting features to effectively illuminate project entryways, seating areas, lobbies, elevators, service areas, and parking areas with sufficient illumination and minimum dead space to eliminate areas of concealment. Full cut-off fixtures shall be installed that minimize glare from the light source and provide light downward and inward to structures to maximize visibility.

(c) Schools

Potential impacts to schools were not assessed in detail in the Certified EIR. Significant impacts to schools could occur if a project were to generate an amount of students that would exceed the capacity of the schools that serve the Project Site, thereby requiring the construction of new facilities, and/or modifications to the existing operational characteristics of the schools that serve the Project Site. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). While the Modified Project would not generate residents at the Project Site, the additional employment generated by the Modified Project would have the potential to generate new students that may attend LAUSD schools. However, the potential for actual student generation is anticipated to be limited because, as discussed above in Section IV.M, Population, Housing, and Employment, on page 134, it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the Project Site. Moreover, any increase in LAUSD enrollment that may occur under the Modified Project would be dispersed across many LAUSD schools, as school attendance is primarily a function of an employee's location of residence rather than

his or her place of work, and Modified Project employees are anticipated to live in many different areas within LAUSD's jurisdiction.

The Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50) allows governing boards of school districts to establish fees to offset costs associated with school facilities made necessary by new construction. The LAUSD collects school developer fees at a rate of $0.47 per square foot of commercial construction, $1.57 per square foot of office construction, $1.31 per square foot of retail construction, and $0.09 per square foot of parking structure construction.[87] Payment of these fees is required prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to fully mitigate all potential project impacts on school facilities from implementation of a project to a less-than-significant level. As the payment of these fees is mandatory, through compliance with this regulatory requirement the Modified Project's potential impacts with regard to school facilities would be less than significant. No mitigation measures are required. Therefore, the Modified Project would not result in any new significant impacts with respect to schools, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

With regard to potential impacts on schools during construction, as discussed in Section IV.C, Air Quality, on page 49 of this Addendum, impacts with respect to localized air quality during construction would be less than significant under the Modified Project, consistent the conclusions of the Certified EIR's analysis for the Original Stadium Project. As discussed in Section IV.L, Noise, on page 119 of this Addendum, the Certified EIR determined that the Original Stadium Project would result in significant construction-related noise impacts at Receptor Location 1, which is near the southwest corner of the Project Site and represents the Ralph M. Parsons Pre-School located within the Expo-Center. This impact would remain significant and unavoidable under the Modified Project, but would not substantially increase compared to levels analyzed in the Certified EIR. As discussed in Section IV.O, Traffic/Transportation/Parking, on page 149 of this Addendum, potential impacts from construction-related traffic were not assessed in detail in the Certified EIR. Nonetheless, the analysis in Section IV.O, Traffic/Transportation/Parking, determined that construction-related traffic impacts under the Modified Project would be less than significant. Furthermore, the Modified Project would continue to implement EIR Mitigation Measure MM G-1 requiring the preparation and implementation of a Construction Management Plan, subject to LADOT approval, which would establish proposed haul routes and staging areas for the transportation of materials and equipment with consideration for sensitive uses in the neighborhood, including schools. Therefore,

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[87] *City of Los Angeles Department of Building and Safety, Building Permit Fee Estimate, http://netinfo.ladbs.org/feecalc.nsf/cef2203faf5fd7df88257799006440 31?OpenForm, accessed June 17, 2015.*

construction of the Modified Project would not result in any new significant impacts with respect to schools, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(d) Parks and Recreation

Potential impacts to parks and recreational facilities were not assessed in detail in the Certified EIR. Significant impacts to parks and recreational facilities could occur if a project were to create an increased demand for parks and recreational facilities that could result in the need for new or physically altered facilities. Parks within the City's boundaries are operated and maintained by the Los Angeles City Recreation and Parks Department. During construction of the Modified Project, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. There is potential for construction workers to spend their lunch breaks at the parks and recreational facilities located in proximity to the Project Site, particularly the open space areas within Exposition Park. However, any such use would be temporary and nominal and would not be anticipated to create an increased demand for parks and recreational facilities that could result in the need for new or physically altered facilities. Therefore, the Modified Project's potential impacts with respect to parks and recreational facilities would be less than significant during construction. No mitigation measures are required.

Since no residential uses would be developed as part of the Modified Project, no new residents would be generated on-site during Modified Project operations. Thus, implementation of the Modified Project would not result in on-site residents who would utilize nearby parks and/or recreational facilities. The standards and goals imposed by the City's Public Recreation Plan with respect to parks and recreation relate specifically to residential users. While the Modified Project would not generate residents at the Project Site, the additional employment generated by the Modified Project would have the potential to generate an increased demand for parks and recreation facilities, particularly the open space areas within Exposition Park adjacent to the Project Site, including recreational facilities within the Expo Center. However, this potential is anticipated to be limited because, as discussed above in Section IV.M, Population, Housing, and Employment, on page 134, it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the Project Site. While employees could spend their lunch breaks in Exposition Park or at other nearby facilities, any such use would be for limited periods and would not be anticipated to create an increased demand for parks and recreational facilities that could result in the need for new or physically altered facilities. The uses proposed under the Modified Project could result in increased usage of Exposition Park due to the patrons that would be drawn to the Project Site as compared to existing conditions, particularly since the Ancillary Uses would

be open on non-event days. However, it is anticipated that any potential increase in demand would be offset by the open space amenities that would be included as part of the Modified Project. Specifically, as compared the Original Stadium Project, the Modified Project would provide enhanced pedestrian improvements and open space areas, including approximately 143,000 square feet of improved public open space around the Project Site that would include pedestrian walkways and plazas featuring a mix of hardscape and landscaped areas and could potentially include water features, public art, and seating areas. Therefore, operation of the Modified Project would not result in a substantial adverse impact to parks and recreational facilities, and impacts would be less than significant. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to parks and recreational facilities, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(e) Other Public Facilities

Potential impacts to other public facilities (i.e., libraries) were not assessed in detail in the Certified EIR. Significant impacts to libraries could occur if a project were to create an increased demand for library facilities that could result in the need for new or physically altered facilities. Library services within the Project area are provided by the Los Angeles Public Library (LAPL). The LAPL assesses service capacity based on the residential population within a specified distance of City libraries. The closest library to the Project Site is the Exposition Park–Dr. Mary McLeod Bethune Regional Library located at 3900 S. Western Avenue, approximately 1.5 miles from the Project Site. The residential population of a library's service area is the primary metric used by the LAPL for assessing the adequacy of library services and planning for future growth. Because no residential uses would be developed as part of the Modified Project, no new residents would be generated on-site. Thus, implementation of the Modified Project would not result in a direct increase in the number of residents within the service population of the Exposition Park–Dr. Mary McLeod Bethune Regional Library. As such, the Modified Project would not exceed the capacity of the local libraries to adequately serve the existing residential service population based on target service populations. In addition, it is unlikely that construction workers would utilize the libraries that serve the Project Site on their way to/from work or during their lunch hours. Rather, construction workers would likely utilize library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. While new employment at the Project Site would have the potential to generate an indirect demand for library services, this potential demand is anticipated to be limited because, as discussed above in Section IV.M,

Population, Housing, and Employment, on page 134, it is anticipated that the majority of Modified Project employees would come from the existing labor pool and would not relocate as a result of working at the Project Site. While employees could spend their lunch breaks at nearby libraries or visit them after work, any such use would be for limited periods and would not be anticipated to create an increased demand for libraries that could result in the need for new or physically altered facilities. Furthermore, due to the periodic, largely event-driven nature of the uses proposed on-site, and the distance to the nearest library, it is unlikely that the demand for LAPL facilities would increase as a result of visitors and patrons generated by the Modified Project. Therefore, the Modified Project would not result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered LAPL facilities, and impacts would be less than significant. No mitigation measures are required. As such, the Modified Project would not result in any new significant impacts with respect to other public facilities (i.e., libraries), and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

O. Traffic/Transportation/Parking

The following analysis of the Modified Project's potential impacts associated with traffic, transportation, and parking is based on the Draft Technical Memorandum, dated October 2010, to the Los Angeles Department of Transportation (LADOT) from Fehr & Peers Transportation Consultants, of the Proposed Redevelopment of the Los Angeles Memorial Sports Arena (see Appendix F to the Certified EIR); the Traffic, Transportation and Parking analysis provided in Section IV.J of the Certified EIR; the Los Angeles Football Club Stadium Project Draft Transportation Analysis Report (Modified Project Transportation Report) prepared by Fehr & Peers Transportation Consultants, dated August 2015; and the Parking Analysis for the Los Angeles Football Club Stadium Project (Modified Project Parking Analysis) prepared by Fehr & Peers Transportation Consultants, dated August 2015. The Modified Project Transportation Report is included in Appendix P-1 of this Addendum. LADOT reviewed and approved the Modified Project Transportation Report on August 10, 2015. A copy of LADOT's Assessment Letter is included as in Appendix P-2 of this Addendum. The Modified Project Parking Analysis is included in Appendix Q of this Addendum.

(a) Construction

Potential impacts from construction-related traffic were not assessed in detail in the Certified EIR. LADOT generally considers construction-related traffic to cause adverse but less than significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. Additionally, in the context of Appendix G of the CEQA Guidelines, the *L.A.*

CEQA Thresholds Guide includes specific factors to be considered with regard to impacts associated with transportation, including construction-related traffic.[88] Based on these factors, for the purposes of this analysis, construction of the Modified Project would have a significant impact on traffic and circulation if construction activities were to: (1) cause substantial delays and disruption of existing traffic flow; (2) require substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians would occur; (3) result in changes to bus/transit service such that a substantial inconvenience to riders would occur; or (4) result in the substantial loss of on-site and/or off-site parking such that the parking needs of the Project area would not be met.

(i) Proposed Construction Activities and Schedule

As discussed in Section III, Project Description, on page 4, construction of the Modified Project is expected to take a total of approximately 20.5 months to complete. Construction is anticipated to involve five key phases:

1. Abatement & Soft Demolition—Approximately 10 weeks, 48 truckloads per workday, 80 workers.

2. Structure Demolition—Approximately 14 weeks, 72 truckloads per workday, 40 workers.

3. Grading—Approximately 4 weeks, 200 truckloads per workday, 40 workers.

4. Building Construction—Approximately 14 months, peak of 25 truckloads per workday (peak of 50 ready-mix concrete truckloads per day during concrete structure operations), typically 150 workers, and peak of 275 workers.

5. Site Finishes—Approximately 2 months overlapping with the last several weeks of building construction, trucks and workers included in estimates for building construction phase.

As discussed in Section IV.L, Noise, on page 119, pursuant to Mitigation Measure CR G-2 in the Certified EIR, construction and demolition activities under the Modified Project would be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday, which is more restrictive than Section 41.40 of the LAMC, which restricts construction hours to the hours of 7:00 A.M. to 9:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday and national holidays. Pursuant to Section 41.40 of the LAMC, construction activities are prohibited on Sundays. However,

[88] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, p. L.8-2.*

construction hours may be extended with approval from the Executive Director of the Board of Police Commissioners. Under the proposed Modified Project, the Applicant may seek approval from the Executive Director to extend the construction hours to permit interior construction activities outside of the hours provided in Mitigation Measure CR G-2. Refer to Section IV.L, Noise, on page 119, for additional discussion.

Peak hauling activity is anticipated to occur during the grading phase. Approximately 200 haul trucks are expected on peak days of activity. The hauling activity is likely to use double-belly dump haul trucks. For access to the I-110 freeway to/from both the south and the north, the primary anticipated truck route would be via Martin Luther King, Jr. Boulevard for inbound and outbound trucks. These trucks could adversely affect the adjacent roadway network since the major roadways anticipated to be used as a truck route for the Modified Project already experience congestion during peak traffic periods. Thus, a secondary route, expected to be used infrequently, would be Figueroa Street to Martin Luther King, Jr. Boulevard to the I-110 freeway. In addition to haul trucks, the Project Site is also expected to generate equipment and delivery trucks during each phase of construction. One example would be concrete delivery, which would be required to lay foundation. Other materials could include plumbing supplies, electrical fixtures, and items used in furnishing the Modified Project. These materials would be delivered to the Project Site and stored on-site. These deliveries are expected to occur in variety of vehicles, including small delivery trucks to cement mixer trucks and 18-wheel trucks. Additionally, construction equipment would also have to be delivered to the Project Site. This equipment could include cranes, bulldozers, excavators, and other large items of machinery. Most of the heavy equipment is expected to be transported to the Project Site on large trucks such as 18-wheelers or other similar vehicles.

The Modified Project proposes to provide sufficient construction staging areas either on the Project Site itself or in the adjacent Exposition Park Parking Lot 6 for trucks throughout the construction period. One or two trucks may queue along the Martin Luther King, Jr. Boulevard curbside between Figueroa Street and Hoover Street before entering the Project Site. Temporary and occasional truck staging at this location may result in lane closures along Martin Luther King, Jr. Boulevard. Such closures, if required, would be subject to LADOT review and approval.

The number of construction workers would vary throughout the construction period. The maximum number of workers expected to be generated on a peak worker trip day would occur during the building construction phase, when it is expected that up to 275 workers could be on-site on a single day. Parking for all construction workers would be provided either on the Project Site or in the adjacent Exposition Park Parking Lot 6.

(ii) Intersections

A construction period trip generation analysis was conducted in the Modified Project Transportation Report to estimate daily, morning, and evening peak-hour passenger car equivalent (PCE) trips. Construction workers often travel to and from a worksite outside of the typical peak commute hours. For the purpose of the analysis, and in accordance with Project Design Feature O-5, it was assumed that up to 70 construction workers would arrive during the peak morning commute hour and up to 180 construction workers would depart during the peak evening commute hour. Trucks were assumed to arrive and depart evenly through an 11-hour construction day. A PCE factor of 2.5 was assumed for double belly dump haul trucks while a PCE factor of 2.0 was assumed for concrete, vendor and delivery trucks, based on the 2010 *Highway Capacity Manual*.

Table 7 in the Modified Project Transportation Report included in Appendix P-1 of this Addendum presents the estimated construction truck and employee vehicle trip generation for each of the Modified Project's proposed construction phases. Table 8 in the Modified Project Transportation Report presents the estimated construction trip generation by phase converted into passenger car equivalents. As shown on Table 7, the highest number of potential construction-related vehicle trips on a daily basis could occur during the concrete pour element of the building construction phase, with up to 275 workers and 50 trucks per day for a total of 788 daily vehicle trips. As shown on Table 8, the highest number of potential construction-related PCE trips on a daily basis, however, could occur during the grading phase, with up to 200 haul trucks and 40 workers per day leading to an estimate of 1,100 daily PCE trips. During peak hours, up to 125 (80 inbound and 45 outbound) PCE trips are projected during the A.M. peak hour and up to 200 (10 inbound and 190 outbound) PCE trips are projected during the P.M. peak hour.

The peak construction activity would generate fewer daily trips, A.M. peak-hour inbound trips, and P.M. peak-hour outbound trips than are projected for the Modified Project's Ancillary Uses on a non-event weekday (as demonstrated in the Modified Project Transportation Report, A.M. inbound and P.M. outbound trips are the most critical trips in terms of their potential to impact operating conditions at nearby study area intersections). Specifically, as discussed below in Section IV.O.b, Traffic/Transportation/Parking, on page 155, the Modified Project's Ancillary Uses are estimated to generate a net external 2,615 daily trips on a non-event weekday, including 85 inbound trips during the A.M. peak hour and 197 outbound trips during the P.M. peak hour, which would result in less than significant impacts to study area intersections. Therefore, because Modified Project construction traffic would fall within the scope of the Ancillary Use's operational non-event day traffic, potential traffic impacts associated with construction would also be less than significant. Nonetheless it is conservatively recognized that the influx of material and equipment could create impacts on the adjacent roadway network based on the following considerations:

- There may be intermittent periods when large numbers of material deliveries are required, such as when concrete trucks would be needed for the concrete pour.

- Some of the materials and equipment could require the use of large trucks (18-wheelers), which could create additional congestion on the adjacent roadways.

- Delivery vehicles may need to queue temporarily on adjacent roadway of Martin Luther King, Jr. Boulevard before entering the Project Site. Based on past experience, it is not uncommon for these types of deliveries to result in temporary lane closures.

The Certified EIR included Mitigation Measure G-1 requiring the preparation of a construction-related traffic management plan to reduce construction-related noise impacts. This mitigation measure would also serve to reduce construction-related traffic impacts. Mitigation Measure G-1 has been incorporated into the Modified Project's MMP (see Appendix A of this Addendum), along with modifications that are detailed below based on recommendations from the Modified Project Transportation Report. While the Modified Project Transportation Report concludes that potential traffic impacts from Modified Project construction would be less than significant in the absence of mitigation, implementation of Mitigation Measure G-1, as revised below, would further ensure that the Modified Project would not result in substantial delays and disruption of existing traffic flow. Therefore, peak-hour intersection impacts during construction would remain less than significant following the implementation of this measure.

(iii) Access and Safety

During construction of the Modified Project, construction trucks and workers would access the Project Site via Martin Luther King, Jr. Boulevard. The Modified Project proposes to provide adequate construction truck staging and construction worker parking either on the Project Site or in the adjacent Exposition Park Parking Lot 6 throughout the construction period. One or two trucks may queue along the Martin Luther King, Jr. Boulevard curbside between Figueroa Street and Hoover Street before entering the Project Site. Temporary and occasional truck staging at this location may result in lane and/or sidewalks closures along Martin Luther King, Jr. Boulevard. However, it is not uncommon for these types of deliveries to result in temporary lane closures. Furthermore, as stated in revised Mitigation Measure G-1 below, the Construction Management Plan would include provisions to ensure driver and pedestrian safety along affected roadways and sidewalks, including: implementing a worksite traffic control plan to route traffic and/or pedestrians around lane and/or sidewalk closures; maintaining existing access for land uses in proximity of the Project Site; scheduling deliveries and pick-ups of construction materials to off-peak travel periods, to the extent feasible; and using flag persons to control traffic movement during the ingress and egress of trucks and heavy equipment to/from the

Project Site. Implementation of the Construction Management Plan would minimize potential conflicts between construction activity and pedestrian and vehicular traffic in the vicinity of the Project Site, further ensuring that the Modified Project would not result in substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians would occur. Therefore, construction traffic impacts related to access and safety would be less than significant.

(iv) Public Transit

There are a variety of public transit facilities in the vicinity of the Project Site. For purposes of evaluating potential impacts to transit resulting from Modified Project construction, transit stops immediately adjacent to the Project Site and in the vicinity of truck and construction worker access points and potential queue areas were analyzed. These transit stops include: a bus stop for the Metro Line 200 and Metro Line 40 at the northeast corner of Figueroa Street and on Martin Luther King, Jr. Boulevard; a bus stop for Metro Line 81 and the LADOT DASH Southeast Line at the southeast corner of Figueroa Street and on Martin Luther King, Jr. Boulevard; a bus stop for Metro Line 40 at the northwest corner of Martin Luther King, Jr. Boulevard and Hoover Street; and a bus stop for the Metro Lines 81, 200, 442, and 550 and the DASH Southeast Line at the southeast corner of 39th Street and Figueroa Street. These transit stops would be maintained during construction of the Modified Project, including any potential lane closures on Martin Luther King, Jr. Boulevard, which would be limited to the stretch between Hoover Street and Figueroa Street (east of the Metro Line 40 bus stop). Furthermore, pursuant to Mitigation Measure J-2 in the Certified EIR, which would be implemented under the Modified Project, the Applicant would coordinate with Metro Bus Operation Control Special Events Coordinator regarding construction activities that may affect Metro and LADOT bus line operations. Therefore, construction of the Modified Project would not result in changes to bus/transit service such that a substantial inconvenience to riders would occur, and construction traffic impacts related to bus/transit service would be less than significant.

(v) Parking

As discussed in the Modified Project Transportation Report, during all phases of Modified Project construction, construction workers would park on the Project Site and/or in the Exposition Park Parking Lot 6 adjacent to the Project Site. This combined parking supply would be sufficient to accommodate construction-related parking. Pursuant to Project Design Feature O-1, the Applicant would be required to coordinate construction parking through the Exposition Park General Manager, who manages the parking supply in Exposition Park. To the degree that any portion of Parking Lot 6 is required for parking for events occurring in Exposition Park during Modified Project construction, coordination through the General Manager would ensure that adequate parking supplies are provided either by requiring all construction workers to park on the Project Site during those events,

or requiring the Applicant to secure temporary off-site parking facilities for event users in the numerous nearby lots (such as those maintained by USC). Construction is not anticipated to require the removal of, or impair access to, on-street parking spaces along Martin Luther King, Jr. Boulevard or Figueroa Street adjacent to the Project Site, as street parking is not permitted along these street segments. Therefore, construction of the Modified Project would not result in substantial loss of on-site and/or off-site parking such that the parking needs of the Project Site area would not be met, and construction traffic impacts related to parking would be less than significant.

(vi) Conclusion

Based on the analysis above, Modified Project construction would result in less-than-significant traffic and transportation impacts to area intersections. Specifically, construction of the Modified Project would not: (1) cause substantial delays and disruption of existing traffic flow; (2) require substantial roadway and/or sidewalk closures to the extent that a hazard to roadway travelers and/or pedestrians would occur; (3) result in changes to bus/transit service such that a substantial inconvenience to riders would occur; or (4) result in the substantial loss of on-site and/or off-site parking such that the parking needs of the Project area would not be met. Construction-related impacts to traffic, transportation, and parking would be further reduced with implementation of Mitigation Measure G-1 from the Certified EIR, as revised below, and Mitigation Measure J-2 from the Certified EIR. No additional mitigation measures are required. As such, the Modified Project would not result in any new significant impacts with respect construction-related traffic, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(b) Operation

The traffic impacts of operating the Original Stadium Project were analyzed in the Certified EIR (refer to Section IV.J, Transportation, Traffic, and Parking, of the Certified EIR), which concluded that no new significant traffic impacts would result from a game or event hosted at the proposed stadium as compared to operation of the existing Sports Arena. Further, since the Coliseum and the Sports Arena currently hold events with up to 93,000 persons in attendance combined, the Certified EIR also concluded that no new traffic impacts would result from concurrent events in the Coliseum and Original Stadium Project with combined attendees of up to 93,000 persons, and included a mitigation measure (Mitigation Measure J-1) to ensure that events in the two venues are scheduled in such a manner as to not exceed this limit. As stated below, Mitigation Measure J-1 would continue to be implemented under the Modified Project, and has been incorporated into the Modified Project's MMP (see Appendix A of this Addendum). Additionally, the Certified EIR did not account for the trip reduction associated with the Expo Light Rail stations in proximity to the Project Site. The Expo Park/USC Station is located approximately 0.35 mile

from the Project Site and the Expo/Vermont Station is located approximately 0.7 mile from the Project Site. Given the proximity of these stations, it is anticipated that a substantial number of attendees at the Modified Project would use the light rail on event days, further reducing the less-than-significant event day traffic impacts identified in the Certified EIR.

Like the Original Stadium Project analyzed in the Certified EIR, the Modified Project proposes a 22,000-seat professional soccer stadium. Pursuant to Project Design Feature O-4, the Ancillary Uses proposed as part of the Modified Project would be open only to ticket-holding game/event patrons during a period of time before, during and after the game/event, with no material increase in event-related traffic expected. Therefore, because traffic impacts are assessed based on peak-hour conditions, the Certified EIR's conclusions with respect to event day traffic would not change under the Modified Project, and potential impacts on event days in the Modified Project would remain less than significant.

However, because the Modified Project's proposed Ancillary Uses would be open to the public on non-event days, this analysis focuses on and quantitatively evaluates potential traffic impacts related to operation of the Ancillary Uses on non-event days.

(i) Intersections

The following analysis assumes that the Modified Project would be completed by 2018 and analyzes the Modified Project's potential traffic impacts on weekday non-event days under both existing and future year traffic conditions. Specifically, the following traffic scenarios are analyzed: Existing Conditions (Year 2015), Existing (Year 2015) plus Project Conditions, Future Base (Year 2018) Conditions, and Future (Year 2018) plus Project Conditions. For further discussion of the traffic scenarios and the assumptions on which they are based, refer to the Modified Project Transportation Report in Appendix P-1 of this Addendum.

Fourteen study intersections were identified for purposes of this analysis, in consultation with LADOT (pursuant to a Memorandum of Understanding (MOU) dated May 7, 2015). All 14 intersections are signalized and, in accordance with LADOT guidelines and City of Los Angeles requirements, the signalized intersections were analyzed for potential Modified Project traffic impacts on weekday non-event days. The study intersections are as follows:

1. Vermont Avenue & Exposition Boulevard
2. Vermont Avenue & Martin Luther King, Jr. Boulevard
3. Hoover Street & Martin Luther King, Jr. Boulevard

4. Figueroa Street & Exposition Boulevard
5. Figueroa Street & Flower Street
6. Figueroa Street & Exposition Park Drive/39th Street
7. Figueroa Street & Martin Luther King, Jr. Boulevard
8. Flower Street/I-110 Off-Ramp & Exposition Boulevard
9. Flower Street & 37th Street
10. Hope Street & 37th Street
11. I-110 Ramps & Martin Luther King, Jr. Boulevard
12. Hill Street/I-110 Ramps & Martin Luther King, Jr. Boulevard
13. Hoover Street & Vernon Street
14. Figueroa Street & Vernon Street

For further discussion of the existing conditions of the study area, refer to the Modified Project Transportation Report in Appendix P-1 of this Addendum.

Trip generation rates from *Trip Generation, 9th Edition* (Institute of Transportation Engineers [ITE], 2012) were used to estimate the number of trips associated with the Modified Project's Ancillary Uses on non-event weekdays. As shown in Table 15 on page 158, the Ancillary Uses are estimated to generate a net external 2,615 daily trips on a non-event weekday, including 89 trips (85 inbound/4 outbound) during the A.M. peak hour and 260 trips (63 inbound/197 outbound) during the P.M. peak hour. The Modified Project's traffic was assigned to the street network using the distribution patterns described in Figure 5A and Figure 5B of the Modified Project Transportation Report (refer to Appendix P-1 of this Addendum). Additionally, Appendix C of the Modified Project Transportation Report shows the assignment of the Modified Project-generated peak-hour traffic volumes at the analyzed intersections during the A.M. and P.M. peak hours. Trip-generation estimates and intersection traffic distributions account for the design limitations set forth in Project Design Features O-2 and O-3, below.

As shown in Table 16 on page 160, the intersection of Figueroa Street & Martin Luther King, Jr. Boulevard (Study Intersection 7) is projected to operate at Level of Service (LOS) E during the A.M. peak period both under Existing Conditions and Existing plus Project Conditions. Based on the City of Los Angeles' thresholds of significance, which are

Table 15
Trip Generation Estimate—Modified Project On a Non-Event Weekday

Land Use	ITE Land Use Code	Size (gross sf)	Trip Generation Rates[a]							Estimated Trip Generation						
			Daily Rate	A.M. Peak Hour			P.M. Peak Hour			Trip Rate Unit	Daily Trips	A.M. Peak Hour Trips			P.M. Peak Hour Trips		
				Rate	% In	% Out	Rate	% In	% Out			In	Out	Total	In	Out	Total
Conference Facilities		10.0 ksf															
Persons		261 prsns A.M.	3	100%	50%	0%	100%	10%	75%		1,121	131	0	261	43	323	430
Gross vehicles		430 prsns P.M.[b]	1.00	0.50			0.50			per person	1,121	66	0	66	22	162	184
Internal capture[c]			*16%*		*0%*	*0%*		*53%*	*19%*		(175)	0	0	0	(12)	(31)	(43)
Transit credit[d]			*15%*	*15%*			*15%*				(142)	(10)	0	(10)	(2)	(20)	(22)
Net External Conference											804	56	0	56	8	111	119
Museum	580[g]	0.0 ksf A.M.[i]	5.80	0.89	86%	14%	0.58	16%	84%	per ksf	232	0	0	0	4	19	23
Internal capture[c]		40.0 ksf P.M.	*52%*		*0%*	*0%*		*83%*	*49%*		(121)	0	0	0	(3)	(9)	(12)
Transit credit[d]			*15%*	*15%*			*15%*				(17)	0	0	0	0	(2)	(2)
Net External Museum											94	0	0	0	1	8	9
Team Store	826[h]	0.0 ksf A.M.[i]	44.32	0.96	62%	38%	2.71	44%	56%	per ksf	665	0	0	0	18	23	41
Internal capture[c]		15.0 ksf P.M.	*68%*		*0%*	*0%*		*87%*	*51%*		(454)	0	0	0	(16)	(12)	(28)
Transit credit[d]			*15%*	*15%*			*15%*				(32)	0	0	0	0	(2)	(2)
Pass-by from net trips[e]			*10%*	*10%*			*10%*				(18)	0	0	0	0	(1)	(1)
Net External Team Store											161	0	0	0	2	8	10
Other Retail (fronting Figueroa)	826[h]	0.0 ksf A.M.[i]	44.32	0.96	62%	38%	2.71	44%	56%	per ksf	133	0	0	0	4	4	8
Internal capture[c,f]		3.0 ksf P.M.	*15%*		*0%*	*0%*		*15%*	*15%*		(20)	0	0	0	(1)	(1)	(2)
Transit credit[d]			*15%*	*15%*			*15%*				(17)	0	0	0	0	0	0
Pass-by from net trips[e]			*10%*	*10%*			*10%*				(10)	0	0	0	0	0	0
Net External Other Retail											86	0	0	0	3	3	6
Other Retail (not fronting Figueroa)	826[h]	0.0 ksf A.M.[i]	44.32	0.96	62%	38%	2.71	44%	56%	per ksf	532	0	0	0	15	18	33
Internal capture[c]		12.0 ksf P.M.	*67%*		*0%*	*0%*		*87%*	*51%*		(355)	0	0	0	(13)	(9)	(22)
Transit credit[d]			*15%*	*15%*			*15%*				(27)	0	0	0	0	(1)	(1)
Pass-by from net trips[e]			*10%*	*10%*			*10%*				(15)	0	0	0	0	(1)	(1)
Net External Other Retail											135	0	0	0	2	7	9
Quality Restaurant	931	0.0 ksf A.M.[i]	89.95	0.81	82%	18%	7.39	67%	33%	per ksf	540	0	0	0	29	15	44
Internal capture[c]		6.0 ksf P.M.	*43%*		*0%*	*0%*		*43%*	*44%*		(233)	0	0	0	(12)	(7)	(19)
Transit credit[d]			*15%*	*15%*			*15%*				(46)	0	0	0	(3)	(1)	(4)
Pass-by from net trips[e]			*10%*	*10%*			*10%*				(26)	0	0	0	(1)	(1)	(2)
Net External Quality Restaurant											235	0	0	0	13	6	19
High-Turnover Sit-Down Restaurant	932	0.0 ksf A.M.[i]	127.15	11.52	62%	38%	12.92	51%	49%	per ksf	636	0	0	0	33	32	65
Internal capture[c]		5.0 ksf P.M.	*43%*		*0%*	*0%*		*43%*	*44%*		(274)	0	0	0	(14)	(14)	(28)
Transit credit[d]			*15%*	*15%*			*15%*				(54)	0	0	0	(3)	(3)	(6)
Pass-by from net trips[e]			*20%*	*20%*			*20%*				(62)	0	0	0	(3)	(3)	(6)
Net External High-Turnover Rest.											246	0	0	0	13	12	25
Fast Food Rest. (fronting Figueroa)	933	0.0 ksf A.M.[i]	716.00	43.87	60%	40%	40.09	51%	49%	per ksf	1,074	0	0	0	31	29	60
Internal capture[c,f]		1.5 ksf P.M.	*15%*		*0%*	*0%*		*15%*	*15%*		(161)	0	0	0	(5)	(4)	(9)
Transit credit[d]			*15%*	*15%*			*15%*				(137)	0	0	0	(4)	(4)	(8)
Pass-by from net trips[e]			*50%*	*50%*			*50%*				(388)	0	0	0	(11)	(11)	(22)
Net External Fast Food											388	0	0	0	11	10	21

Table 15 (Continued)
Trip Generation Estimate—Modified Project On a Non-Event Weekday

Land Use	ITE Land Use Code	Size (gross sf)	Trip Generation Rates[a]							Estimated Trip Generation						
			Daily Rate	A.M. Peak Hour			P.M. Peak Hour			Trip Rate Unit	Daily Trips	A.M. Peak Hour Trips			P.M. Peak Hour Trips		
				Rate	% In	% Out	Rate	% In	% Out			In	Out	Total	In	Out	Total
Fast Food Rest. (not fronting Figueroa)	933	0.0 ksf A.M.[i]	716.00	43.87	60%	40%	40.09	51%	49%	per ksf	1,074	0	0	0	31	29	60
Internal capture[c]		1.5 ksf P.M.	*43%*		*0%*	*0%*		*43%*	*44%*		(465)	0	0	0	(13)	(13)	(26)
Transit credit[d]			*15%*	*15%*			*15%*				(91)	0	0	0	(3)	(2)	(5)
Pass-by from net trips[e]			*50%*	*50%*			*50%*				(259)	0	0	0	(8)	(7)	(15)
Net External Fast Food											259	0	0	0	7	7	14
Office	710	25.0 ksf	11.03	1.56	88%	12%	1.55	17%	83%	per ksf	276	34	5	39	7	32	39
Internal capture[c]			*12%*		*0%*	*0%*		*48%*	*13%*		(33)	0	0	0	(3)	(4)	(7)
Transit credit[d]			*15%*	*15%*			*15%*				(36)	(5)	(1)	(6)	(1)	(4)	(5)
Net External Office											207	29	4	33	3	24	27
Project Total											**2,615**	**85**	**4**	**89**	**63**	**197**	**260**

[a] *Institute of Transportation Engineers (ITE), Trip Generation, 9th Edition, 2012, unless otherwise noted.*

[b] *Conference facility trip estimates assume a morning event with 50 percent of attendees arriving during the A.M. peak hour, an afternoon event with 75 percent of attendees departing during the P.M. peak hour, an evening event with 10 percent of attendees arriving during the P.M. peak hour, and an average vehicle occupancy (AVO) of 2.0 attendees per vehicle. Events generating trips during the weekday A.M. peak hour will be limited to 320 attendees.*

[c] *Internal capture represents the percentage of trips between land uses that occur within the Project Site. Estimated using internal capture rates from ITE Trip Generation Handbook, 3rd Edition, 2014, Tables 6.1 and 6.2, balanced to the constrained end of the internal trip. Considers internalization between the various Modified Project uses, as well as between the Modified Project and the California Science Center.*

[d] *LADOT's Traffic Study Policies and Procedures, August 2014, state that a 15-percent transit credit may be taken for projects within 0.25 mile of a transit station or rapid bus stop. The Expo Park/USC LRT station, the Harbor Transitway 37th St./USC station, and Metro Rapid 754 on Vermont individually are each beyond 0.25 mile, but are each within 0.30 to 0.37 mile. Given the proximity of all three services, however, the combined effect of the three is considered to be 15 percent.*

[e] *The source for pass-by credits is Attachment I of LADOT's Traffic Study Policies and Procedures, August 2014.*

[f] *Internal capture for fast food restaurant and other retail possibly along the Figueroa Street frontage capped at 15 percent to reflect the potential that these uses attract a greater level of external trips, given their locations.*

[g] *No daily rate available from ITE for museum. Daily rate assumed to be 10 x P.M. peak-hour rate.*

[h] *Specialty retail (ITE code 826) used for museum store and other retail (used A.M. rate from code 820 since no A.M. rate is available for code 826).*

[i] *The museum, team store, other retail, quality restaurants, high-turnover sit-down restaurants, and fast food restaurants would not open for business until mid- to late-morning and, thus, would generate negligible trips during the A.M. peak hour.*

Source: Fehr & Peers, 2015.

Table 16
Existing Plus Project—Intersection Level of Service Analysis

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Existing V/C	LOS	Existing Plus Project V/C	Existing Plus Project LOS	Project Increase in V/C	Significant Impact?
1	Vermont Ave.	Exposition Blvd.	Weekday A.M.	0.849	D	0.850	D	0.001	No
			Weekday P.M.	0.728	C	0.733	C	0.005	No
2	Vermont Ave.	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.814	D	0.823	D	0.009	No
			Weekday P.M.	0.766	C	0.775	C	0.009	No
3	Hoover St.	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.713	C	0.713	C	0.000	No
			Weekday P.M.	0.529	A	0.543	A	0.014	No
4	Figueroa St.	Exposition Blvd.	Weekday A.M.	0.644	B	0.644	B	0.000	No
			Weekday P.M.	0.731	C	0.734	C	0.003	No
5	Figueroa St.	Flower St.	Weekday A.M.	0.513	A	0.517	A	0.004	No
			Weekday P.M.	0.445	A	0.453	A	0.008	No
6	Figueroa St.	Exposition Park Dr/39th St.	Weekday A.M.	0.615	B	0.618	B	0.003	No
			Weekday P.M.	0.503	A	0.512	A	0.009	No
7	Figueroa St.	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.906	E	0.915	E	0.009	No
			Weekday P.M.	0.860	D	0.869	D	0.009	No
8	Flower St./I-110 Off-Ramp	Exposition Blvd.	Weekday A.M.	0.341	A	0.344	A	0.003	No
			Weekday P.M.	0.581	A	0.591	A	0.010	No
9	Flower St.	37th St.	Weekday A.M.	0.306	A	0.306	A	0.000	No
			Weekday P.M.	0.352	A	0.352	A	0.000	No
10	Hope St.	37th St.	Weekday A.M.	0.483	A	0.483	A	0.000	No
			Weekday P.M.	0.461	A	0.461	A	0.000	No
11	I-110 Ramps	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.677	B	0.681	B	0.004	No
			Weekday P.M.	0.553	A	0.574	A	0.021	No
12	Hill St./I-110 Ramps	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.765	C	0.767	C	0.002	No
			Weekday P.M.	0.836	D	0.837	D	0.001	No
13	Hoover St.	Vernon St.	Weekday A.M.	0.710	C	0.711	C	0.001	No
			Weekday P.M.	0.517	A	0.519	A	0.002	No
14	Figueroa St.	Vernon St.	Weekday A.M.	0.755	C	0.757	C	0.001	No
			Weekday P.M.	0.652	B	0.655	B	0.003	No

Source: Fehr & Peers, 2015.

further discussed in the Modified Project Transportation Report (refer to Appendix P-1 of this Addendum), increased traffic resulting from Modified Project non-event weekday operations would be below the applicable thresholds of significance at the intersection of Figueroa Street & Martin Luther King, Jr. Boulevard (Study Intersection 7) and at all other study area intersections. Therefore, the Modified Project's potential traffic and transportation impacts at intersections under Existing plus Project Conditions would be less than significant, and no mitigation measures would be required.

As shown in Table 17 on page 161, the following three intersections are projected to operate at LOS E or worse during one or both of the peak hours during both Future Base (Year 2018) Conditions, and Future (Year 2018) plus Project Conditions on a non-event day: Vermont Avenue & Exposition Boulevard (Study Intersection 1); Figueroa Street & Exposition Boulevard (Study Intersection 4); and Figueroa Street & Martin Luther King, Jr. Boulevard (Study Intersection 7). Based on the City of Los Angeles' thresholds of significance, which are further discussed in the Modified Project Transportation Report (refer to Appendix P-1 of this Addendum), increased traffic resulting from Modified Project non-event weekday operations would be below the applicable thresholds of significance at these three intersections and at all other study area intersections. Therefore, the Modified Project's potential traffic and transportation impacts at intersections under Future plus Project Conditions would be less than significant, and no mitigation measures would be required.

(ii) Congestion Management Program

The Los Angeles County Metropolitan Transportation Authority's (Metro) Congestion Management Program (CMP) requires that, when an environmental impact report is prepared for a project, traffic and public transit impact analyses be conducted for select regional facilities based on the quantity of project traffic expected to use those facilities.[89] The closest CMP arterial monitoring station, the intersection of Alameda Street & Washington Boulevard, is approximately 2.5 miles from the Project Site. As described in the Modified Project Transportation Report (see Appendix P-1 of this Addendum), the Modified Project would not add 50 or more vehicle trips during the A.M. or P.M. peak hours on non-event days at this intersection. Therefore, no further arterial review using CMP criteria is required.

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[89] *In addition, the "Agreement between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures" sets forth criteria for when a freeway impact analysis should be conducted. LADOT determined as part of the Traffic Study Memorandum of Understanding for the Modified Project that the Modified Project would not meet these criteria for requiring a freeway impact analysis. Therefore, no further analysis under the City's agreement with Caltrans is required.*

Table 17
Future Plus Project—Intersection Level of Service Analysis

ID	N/S Street Name	E/W Street Name	Analyzed Periods	Future Without Project V/C	LOS	Future Plus Project		Project Increase in V/C	Significant Impact?
						V/C	LOS		
1	Vermont Ave.	Exposition Blvd.	Weekday A.M.	0.914	E	0.915	E	0.001	No
			Weekday P.M.	0.775	C	0.780	C	0.005	No
2	Vermont Ave.	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.844	D	0.853	D	0.009	No
			Weekday P.M.	0.808	D	0.816	D	0.008	No
3	Hoover St.	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.738	C	0.738	C	0.000	No
			Weekday P.M.	0.550	A	0.563	A	0.013	No
4	Figueroa St.	Exposition Blvd.	Weekday A.M.	1.072	F	1.072	F	0.000	No
			Weekday P.M.	0.948	E	0.955	E	0.007	No
5	Figueroa St.	Flower St.	Weekday A.M.	0.599	A	0.602	B	0.003	No
			Weekday P.M.	0.521	A	0.539	A	0.018	No
6	Figueroa St.	Exposition Park Dr/39th St.	Weekday A.M.	0.891	D	0.893	D	0.002	No
			Weekday P.M.	0.744	C	0.753	C	0.009	No
7	Figueroa St.	Martin Luther King, Jr. Blvd.	Weekday A.M.	1.136	F	1.145	F	0.009	No
			Weekday P.M.	1.091	F	1.100	F	0.009	No
8	Flower St./I-110 Off-Ramp	Exposition Blvd.	Weekday A.M.	0.412	A	0.414	A	0.002	No
			Weekday P.M.	0.724	C	0.734	C	0.010	No
9	Flower St.	37th St.	Weekday A.M.	0.348	A	0.348	A	0.000	No
			Weekday P.M.	0.429	A	0.429	A	0.000	No
10	Hope St.	37th St.	Weekday A.M.	0.567	A	0.567	A	0.000	No
			Weekday P.M.	0.595	A	0.595	A	0.000	No
11	I-110 Ramps	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.701	C	0.705	C	0.004	No
			Weekday P.M.	0.586	A	0.606	B	0.020	No
12	Hill St./I-110 Ramps	Martin Luther King, Jr. Blvd.	Weekday A.M.	0.791	C	0.792	C	0.001	No
			Weekday P.M.	0.864	D	0.865	D	0.001	No
13	Hoover St.	Vernon St.	Weekday A.M.	0.735	C	0.736	C	0.001	No
			Weekday P.M.	0.535	A	0.538	A	0.003	No
14	Figueroa St.	Vernon St.	Weekday A.M.	0.779	C	0.781	C	0.002	No
			Weekday P.M.	0.675	B	0.678	B	0.003	No

Source: Fehr & Peers, 2015.

The CMP mainline freeway monitoring stations closest to the Project Site are I-10 at Budlong Avenue and I-110 at Slauson Avenue. According to the trip generation and distribution estimates discussed above, the Modified Project is projected to result in an increase of fewer than 150 trips for both the morning and evening peak hours on non-event days at both of these locations. Additionally, the Modified Project is projected to result in an increase of fewer than 150 trips for both the morning and evening peak hours on non-event days on I-110 at Exposition Boulevard and Martin Luther King, Jr. Boulevard and on I-10 at Vermont Avenue and Hoover Street, which represent the freeway segments closest to the Project Site. Since fewer than 150 trips would be added during the A.M. or P.M. peak hours to the freeways serving the study area, no further analysis of the freeway segments is required for CMP purposes.

As further discussed in the Modified Project Transportation Report (refer to Appendix P-1 of this Addendum), the Modified Project would generate an estimated 22 transit riders in A.M. peak hour and an estimated 75 transit riders in the P.M. peak hour on non-event days.[90] The Project Site is well served by numerous established local and regional transit routes, including the Metro Expo light rail transit line (with the Expo Park/USC Station located approximately 0.35 mile from the Project Site), the Metro Silver Line and numerous express bus routes on the Harbor Transitway (with the 37th Street/USC station located approximately 0.37 mile from the Project Site), four local lines, one rapid line, and two express routes operated by Metro, and two LADOT DASH routes. The total estimated capacity for transit services in the Project Site vicinity is approximately 24,380 persons in the peak hours. Furthermore, The Modified Project would utilize approximately 0.3 percent of available transit capacity during the peak hours on non-event days.

As stated in the Certified EIR, the operation of Phase I of Metro's Exposition Light Rail Transit Project was anticipated to commence in 2011, prior to the anticipated build-out of the Original Stadium Project. With a dedicated station to serve Exposition Park (the Expo Park/USC Station), the planned capacity of the Expo Line accounted for existing uses within Exposition Park, including the existing Sports Arena. The Original Stadium Project would not increase the maximum historic attendance levels on-site compared to the

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[90] *As part of the trip generation estimates presented in Table 15 on page 158, a transit credit of 15 percent was taken for the conference, museum, retail, restaurant, and office land uses. This credit accounts for trips made to and from the Project Site using modes other than automobiles. These include trips on light-rail, bus, bicycle, walk, etc. As discussed in the Modified Project Transportation Report (refer to Appendix P-1 of this Addendum), the 15 percent transit credit is estimated to reduce Modified Project-generated trips by 16 vehicle trips during the A.M. peak hour and 54 vehicle trips during the P.M. peak hour on non-event days. Applying an average vehicle ridership (AVR) factor of 1.4, the Modified Project would generate an estimated 22 transit riders in A.M. peak hour and an estimated 75 transit riders in the P.M. peak hour on non-event days.*

existing Sports Arena, therefore, the planned capacity of the Expo Line also accounted for the potential operation of the Original Stadium Project including stadium events. Operation of the Expo Line has since commenced with the actual opening of Phase 1 in 2012, and the Expo Line currently provides service for approximately 30,300 riders on an average daily basis. Phase 2 of the Expo Line is under construction to Santa Monica and will open in spring 2016. As is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of 22,000 seats, which is within the historic attendance levels of the Sports Arena. On event days, the Project's ancillary uses would be open only to ticket-holding patrons already traveling for the event. Therefore, like the Original Stadium Project, the Modified Project's stadium would not change the event day ridership levels from those anticipated at the time the Expo Line was planned. The Applicant will, however, coordinate with Metro regarding appropriate service levels on event days, pursuant to Project Design Feature O-6.

Based on the analysis above, the Modified Project would result in less-than-significant impacts to CMP transit facilities. No mitigation measures are required.

(iii) Access

As shown in Table 16 and Table 17 on pages 160 and 161, each of the analyzed intersections that provide primary access to the Project Site are projected to operate at LOS C or better under Existing plus Project conditions and at LOS D or better under Future with Project Conditions on non-event days. Therefore, with the addition of Modified Project traffic under these conditions, no significant impact would occur.

(iv) Parking

The Certified EIR determined that the LAMC-required parking requirement for the Original Stadium Project was 4,400 parking spaces. The thresholds on which this analysis was based are stated on page IV.J-5 of the Certified EIR. At the time the Certified EIR was prepared, there were approximately 19,981 parking spaces available within the Exposition Park and USC Campus area that were generally available to meet the parking demands of the land uses within the general vicinity of the Project Site. Specifically, there were approximately 7,340 parking spaces within the Exposition Park area alone that could meet the parking demands of the Coliseum, Sports Arena, and other Exposition Park uses. As such, the Certified EIR determined that an adequate supply of parking existed within the area to meet the LAMC-required parking and the parking demands of future events held under the Original Stadium Project. Therefore, parking impacts were determined to be less than significant.

Like the Original Stadium Project, the Modified Project proposes the development of a 22,000-seat MLS stadium. Therefore, the parking demand associated with the stadium portion of the Modified Project would not change. However, an increase in parking demand beyond levels analyzed in the Certified EIR could result from the Modified Project's Ancillary Uses on non-event days, as well as from employees of the Ancillary Uses on event days. Potential parking impacts associated with each of these conditions are addressed below. The following analysis also addresses potential bicycle parking impacts, which were not analyzed in detail in the Certified EIR.

As discussed in Section III, Project Description, of this Addendum, consistent with the Original Stadium Project, parking for the Modified Project would be provided by the supply available at Exposition Park. Based on an updated parking supply inventory, as detailed in Table 1 in the Modified Project Parking Analysis included in Appendix Q of this Addendum, Exposition Park currently provides approximately 5,961 parking spaces in multiple parking lots and on streets within Exposition Park. These spaces are used by the Coliseum, the Sports Arena, the California Science Center, the Los Angeles County Natural History Museum, the California African American Museum, and other park visitors. Per the terms of the Non-Disturbance Agreement between the California Science Center and the University of Southern California, during special events at the Coliseum or Sports Arena (i.e., events with a reasonably anticipated or actual attendance of 3,000 people or more), 600 parking spaces may be reserved by the California Science Center in the Science Center Structure and 375 spaces may be reserved by the Natural History Museum in Parking Lot 3. If these reservations occur, an estimated 4,986 vehicle spaces would be available for events in the Exposition Park parking supply. The Modified Project would not alter the parking space allocations in the Non-Disturbance Agreement between the California Science Center and USC.

It should also be noted that the on-site VIP parking lot, which contains approximately 238 vehicle parking spaces, is not included in the approximately 5,961-space parking supply in Exposition Park. Under the Modified Project, this parking lot would be retained and reconfigured to provide up to approximately 250 spaces. This would increase the vehicle parking supply in Exposition Park up to approximately 6,211 spaces (5,236 on special event days if the Science Center and Natural History Museum reservations occur).

The parking requirements for the Modified Project were analyzed pursuant to LAMC Section 12.21A.4, which establishes vehicle parking space ratios based on square feet or seats, and Section 12.21A.16, which establishes requirements for bicycle parking spaces. The ratios used to determine the required number of vehicle parking spaces for the Modified Project are shown in Table 18 on page 166 and described in detail in the Modified Project Parking Analysis included in Appendix Q of this Addendum. As shown in Table 18, after applying the aforementioned LAMC parking requirements, the required parking for the

Table 18
Parking Code Analysis—Vehicle Spaces

Use	Size	Code Requirement[a]	Required Vehicle Spaces
Stadium			
Stadium	22,000 seats	1 space per 5 fixed seats	4,400
Total Stadium			**4,400**
Ancillary Uses			
Conference	10.0 ksf	1 space per 35 sq. ft.	286
Museum	40.0 ksf	1 space per 500 sq. ft.	80
Retail	30.0 ksf	1 space per 250 sq. ft.	120
Restaurant	14.0 ksf	1 space per 100 sq. ft.	140
Office	25.0 ksf	1 space per 500 sq. ft.	50
Total Ancillary Uses (without reduction for bicycle parking)			**676**
Total Ancillary Uses (with reduction for bicycle parking)[b]			**648**

[a] *Los Angeles Municipal Code, Section 12.21A.4.*

[b] *The City of Los Angeles Bicycle Ordinance allows for replacement of required vehicle parking spaces for non-residential uses at a ratio of 1 vehicle space for every 4 bicycle spaces up to 20 percent of required spaces. Refer to Table 2 in the Modified Project Parking Analysis included in Appendix Q of this Addendum for calculations.*

Source: Fehr & Peers, 2015.

stadium component of the Modified Project on event days would be 4,400 vehicle parking spaces, consistent with the Certified EIR analysis. For non-event days, as shown in Table 18, the required parking for the Modified Project's Ancillary Uses under the LAMC is estimated at 676 vehicle parking spaces. As discussed below, the Modified Project would provide 107 bicycle parking spaces in LAMC-compliant bike racks (58 as short-term spaces and 49 as long-term spaces), thus satisfying the LAMC-required bicycle parking for the Ancillary Uses on non-event days.[91] The LAMC permits reductions in the required number of vehicle spaces at a ratio of one vehicle space reduced for every four bicycle spaces provided, up to a maximum of 20 percent of the required vehicle spaces for non-residential uses. Thus, 648 vehicle parking spaces would be required on non-event days for the Ancillary Uses when taking a credit for bicycle parking pursuant to the LAMC. Pursuant to Project Design Feature O-4, on event days, the Ancillary Uses would only be open to ticketed patrons of the stadium; thus, the 648 vehicle spaces for the Ancillary Uses would not be needed separate from the stadium requirement. However, to the extent that some

[91] *See LAMC Section 12.21A.16.*

of the Ancillary Uses may be considered additional to the typical uses considered in the LAMC requirement for a stadium, there could be some additional parking need for Ancillary Use employees on event days. As described in the Modified Project Parking Analysis, it is estimated that up to approximately 178 parking spaces may be needed for employees of the Ancillary Uses if they all were to be open during stadium events and were all considered to be additional employees beyond those normally required to operate a stadium (see Table 19 on page 168).[92] This could conservatively increase the Modified Project's potential parking need on event days to as many as 4,578 spaces (4,400 for the stadium and 178 for the additional Ancillary Uses employees), which would still be fully accommodated by the parking supply provided for events in Exposition Park (approximately 4,986 to 5,961 existing spaces and up to 5,236 to 6,211 spaces with the Modified Project). On non-event days, the parking supply provided by Exposition Park (approximately 5,961 existing spaces and up to 6,211 spaces with the Modified Project) would adequately meet the LAMC requirement of 648 vehicle parking spaces for the Modified Project's Ancillary Uses. Therefore, consistent with the conclusions in the Certified EIR for the Approved Stadium Project (refer to Section IV.J, Transportation, Traffic, and Parking, of the Certified EIR), impacts with respect to parking would be less than significant under the Modified Project on event days and non-event days. No mitigation measures are required.

With regard to bicycle parking, the Modified Project would be required to provide at least 440 bicycle parking spaces (two percent of the proposed stadium seating capacity) pursuant to the bicycle parking requirements set forth in a proposed Specific Plan amendment that would require sufficient bicycle parking to accommodate two percent of stadium seating capacity.[93]. One-hundred and seven of these spaces would be provided in LAMC-compliant bike racks (58 as short-term spaces and 49 as long-term spaces), thus satisfying the LAMC-required bicycle parking for the Ancillary Uses on non-event days. The remaining 333 would be provided through a bicycle valet service on event days. In the event that bicycle parking needs increase over time, the bicycle valet service on event days could be expanded. As discussed further in the Modified Project Parking Analysis, the proposed amount of bicycle parking would exceed the bicycle parking rates at the other recently approved professional sports stadiums, including Farmers Field in Los Angeles, Avaya Stadium in San Jose, and Levi's Stadium in Santa Clara. Therefore, the proposed

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[92] *In order to not interfere with the parking supply available to the Coliseum on large Coliseum event days, these employees would be parked either in one or more of the following locations: (1) temporarily in the subterranean loading dock/service area beneath the Project Site; (2) in the VIP parking lot adjacent to the soccer stadium should that development option be constructed; and/or (3) in off-site parking locations to be arranged by the Applicant. If off-site location(s) are beyond 750 feet from the Project Site, shuttles would be provided to shuttle employees between the parking location(s) and the Project Site.*

[93] *The Specific Plan does not currently provide a bicycle parking requirement.*

Table 19
LAFC Employee Parking Needs

Land Use	Total Vehicle Spaces Required per LAMC Code[a]	Estimated Number of Vehicle Spaces Needed for Employees							
		Size (sf)	Employee Factor (employees/sf)[b]	No. of Employees	Transit	Rideshare	AVR	Absentee	Employee Parking Need
Conference Facilities	286	9,000	0.00271	24	15%	10%	1.33	5%	17
Museum	80	36,000	0.00135[c]	49	15%	10%	1.33	5%	35
Retail	120	27,750	0.00271	75	15%	10%	1.33	5%	53
Restaurant	140	11,900	0.00271	32	15%	10%	1.33	5%	23
Office	50	21,250	*assume all code-required spaces are used by employees*						50
Total	**676**	**105,900**							**178**

[a] *From Table 8 of Modified Project Transportation Report.*

[b] *Los Angeles Unified School District, 2012 Developer Fee Justification Study, February 2012.*

[c] *Museum employee density would be lower than retail. Employee factor for industrial parks used as surrogate for museum.*

Source: Fehr & Peers, 2015.

bicycle parking supply would be adequate to satisfy the anticipated bicycle parking demand of the Modified Project, and would be consistent with required bicycle parking rates with approval of the requested Specific Plan amendment. Therefore, impacts related to bicycle parking would be less than significant. No mitigation measures are required.

(v) Conclusion

As demonstrated above, the Modified Project would have less-than-significant traffic, transportation, and parking impacts during both construction and operation. Therefore, the Modified Project would not result in any new significant impacts with respect to traffic, transportation, and parking, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(c) Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to traffic, transportation, and parking:

PDF O-1: The Applicant shall coordinate construction parking through the Exposition Park General Manager. To the degree that any portion of Parking Lot 6 is required for parking for events occurring in Exposition Park during Modified Project construction, adequate parking supplies shall be provided either by requiring all construction workers to park on the Project Site during those events, or requiring the Applicant to secure temporary off-site parking facilities for event users in the numerous nearby lots (such as those maintained by the University of Southern California).

PDF O-2: If the maximum permitted amount of office floor area (i.e., 21,250 square feet) is developed, attendance at morning conference facility functions on non-event days shall be limited to 261 attendees, and attendance at evening conference facility functions on non-event days shall be limited to 430 attendees. For every reduction of 850 square feet in office space floor area that is ultimately built in the Modified Project, the number of persons attending functions in the conference facility could be increased by 5.6 persons for morning conference facility functions on non-event days, and by 3.0 persons for evening conference facility functions on non-event days.

PDF O-3: The museum, team store, other retail uses, and all restaurant uses shall not open for business until 10:00 A.M. or later.

PDF O-4: For periods at least two hours before, during, and two hours after games/events at the proposed stadium, the Ancillary Uses shall be open only to ticket-holding game/event patrons. For events at the adjacent Coliseum reasonably anticipated to equal or exceed

25,000 patrons in attendance, including USC home football games, the Ancillary Uses shall be open only to ticket-holding patrons of those events for periods at least three hours before, during, and two hours after the events.

PDF O-5: Construction activities shall be scheduled so that no more than 70 construction worker vehicles are scheduled to arrive at the Project Site between the hours of 7:00 A.M. and 9:00 A.M.

PDF O-6: The Applicant shall coordinate with Metro on appropriate service levels for Metro transit services on stadium event days, including but not limited to the Expo Light Rail.

The following mitigation measures were included in the Certified EIR to further reduce the less-than-significant traffic impacts associated with construction and operation of the Original Stadium Project. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP included with this Addendum (see Appendix A of this Addendum), but have been revised as follows to reflect the design characteristics of the Modified Project:

EIR Mitigation Measure MM G-1: The Applicant shall prepare a ~~construction-related traffic plan~~ Construction Management Plan detailing proposed haul routes and staging areas for the transportation of materials and equipment, with consideration for sensitive uses in the neighborhood. ~~A traffic and parking plan for the construction phase will~~ The Construction Management Plan shall be submitted for approval by LADOT and the Department of Building and Safety prior to the issuance of any permits. The Construction Management Plan shall include the following requirements:

- The preferred haul route to and from the Project Site shall be Martin Luther King, Jr. Boulevard to and from the Harbor Freeway. Trucks shall not be permitted to travel along local residential streets.
- A flagman shall be placed at the truck entry and exit from the Project Site onto Martin Luther King, Jr. Boulevard to control the flow of exiting trucks.
- Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods to the degree possible and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.
- Access shall remain unobstructed for land uses in proximity to the Project Site during construction of the Modified Project.

- In the event of a lane or sidewalk closure, a worksite traffic control plan, approved by the City of Los Angeles, shall be implemented to route traffic or pedestrians around any such lane or sidewalk closures.
- The locations of truck staging shall be identified and measures shall be included to ensure that trucks use the specified haul route and do not travel through nearby residential neighborhoods.
- Vehicle movements shall be scheduled to minimize vehicles waiting off-site and impeding public traffic flow on the surrounding streets.
- Requirements shall be established for the loading, unloading, and storage of materials on the Project Site.
- Requirements shall be established for the temporary removal of parking spaces, time limits for the reduction of travel lanes, and closing or diversion of pedestrian facilities to ensure the safety of pedestrian and access to local businesses.
- The Applicant shall coordinate with the City and emergency service providers to ensure adequate access is maintained to the Project Site and neighboring businesses.
- If the construction periods for the Modified Project and the My Figueroa Street improvement project overlap, the Applicant shall coordinate with the City to minimize the potential combined effects of the two projects to the extent possible.

EIR Mitigation Measure MM J-1: Combined with the Coliseum, the campus supervised by the Coliseum Commission currently holds events ranging from 500 to 93,000 people in attendance. The Coliseum Commission shall schedule events at the two facilities in such a manner that the event attendance size at the two venues combined does not exceed 93,000 people.

EIR Mitigation Measure MM J-2: The ~~Coliseum Commission~~ Applicant shall coordinate with Metro Bus Operation Control Special Events Coordinator at 213-922-4632 and LADOT Staff regarding construction activities that may affect Metro and LADOT bus line operations.

P. Utilities and Service Systems

The following analysis is based on the Public Utilities analysis provided in Section IV.I of the Certified EIR, and on the Utility Infrastructure Technical Memorandum (Infrastructure Report) prepared for the Modified Project by Langan Engineering and Environmental Services, dated August 28, 2015, which is included in Appendix R of this

Addendum. The Infrastructure Report evaluates the potential environmental impacts associated with the proposed modifications to the Original Stadium Project under the Modified Project to determine whether such modifications would result in new significant impacts to utility infrastructure that were not already evaluated in the Certified EIR.

(a) Wastewater

The Certified EIR for the Original Stadium Project concluded that impacts with respect to wastewater infrastructure and treatment capacity would be less than significant under the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Wastewater, of the Certified EIR). Specifically, the Certified EIR determined that the peak and average wastewater flows from the Project Site would not increase with implementation of the Original Stadium Project as compared to existing conditions since average and maximum attendance levels at the Project Site under the Original Stadium Project would be substantially similar to existing conditions. Therefore, the existing wastewater infrastructure in the Project Site vicinity and existing wastewater treatment facilities would be able to accommodate the Original Stadium Project's demand for wastewater conveyance and treatment, and impacts related to wastewater would be less than significant. The thresholds on which this analysis was based are stated on page IV.I-6 of the Certified EIR.

As discussed in the Certified EIR, wastewater conveyance infrastructure and treatment services for the Project area are provided by the City of Los Angeles Department of Public Works Bureau of Sanitation Division (BOS). The Project Site is serviced by multiple BOS sewers as follows:

- A sewer main in Hoover Street that is 18 inches in diameter south of South Park Drive, transitions to a 10-inch sewer line at South Park Drive and extends northerly, generally along the eastern side of South Coliseum Drive;
- 6- and 8-inch sewer laterals servicing the existing Sports Arena and other uses within Exposition Park; and
- A 72-inch-diameter North Outfall Sewer main in 41st Place, south of the Project Site.

As described in the Certified EIR and Infrastructure Report, the existing Sports Arena is serviced by four sewer laterals: two 6-inch sewer laterals on south side of the Project Site and two additional sewer laterals, 6- and 8-inches in diameter, on the north side of the Project Site. The laterals on the north side of the Project Site head east to an existing manhole, tying into the 10-inch sewer main adjacent to the south side of South Coliseum Drive/Christmas Tree Lane. The laterals on the south side of the Project Site

head west to an existing manhole, transitioning to an 8-inch sewer lateral. The 8-inch lateral continues west to an existing manhole off the existing sewer main adjacent to the east side of South Coliseum Drive. As noted above, this main is 10 inches in diameter north of South Park Drive. South of South Park Drive, it transitions to an 18-inch main, and then runs south to connect to a 72-inch North Outfall Sewer main in 41st Place.

Wastewater generated from the Project Site is conveyed via the local collector sanitary sewer system directly to the Hyperion Treatment Plant (HTP), located southwest of the Los Angeles International Airport in Playa del Rey, for treatment. The HTP has the capacity to treat approximately 450 million gallons per day (mgd) of wastewater for full secondary treatment, and currently treats approximately 362 mgd.[94] This includes wastewater currently generated on the Project Site from the existing Sports Arena. As such, the HTP is currently operating at approximately 80 percent of its capacity, with a remaining available capacity of approximately 88 mgd. The treated water from the HTP is discharged through an outfall pipe 5 miles into the Santa Monica Bay and Pacific Ocean.[95]

Wastewater impacts during construction were not analyzed in detail in the Certified EIR. Wastewater generation would occur incrementally throughout construction of the Modified Project. However, such use would be temporary and nominal when compared with the wastewater generated by operation of the Modified Project, which is analyzed below. In addition, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater conveyance system. As such, wastewater impacts during construction would be less than significant and no mitigation measures are required.

Operational wastewater impacts are assessed based on daily wastewater generation on a maximum activity day (i.e., event day). As is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of 22,000 seats, which is within the historic attendance levels of the Sports Arena. Therefore, wastewater impacts with respect to the stadium portion of the Modified Project would not represent a substantial increase in wastewater generation compared to existing conditions, consistent with the Certified EIR analysis. However, additional event-day wastewater generation beyond levels analyzed in the Certified EIR may result from operation of the Ancillary Uses proposed as part of the Modified Project. Although the estimated wastewater generation of the stadium would not

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[94] *City of Los Angeles Department of Public Works, Bureau of Sanitation, About Wastewater—Facts and Figures, www.lacitysan.org/wastewater/factsfigures.htm, accessed July 23, 2015.*

[95] *City of Los Angeles Department of Public Works, LA Sewers Website, Treatment Plants—Hyperion Treatment Plant, www.lasewers.org/treatment_plants/hyperion/index.htm, accessed July 23, 2015.*

change compared to levels analyzed under the Certified EIR, for informational purposes, and to be consistent with BOS methodology for determining sewer line capacity, this analysis presents the estimated wastewater generation of the entire Modified Project, including the stadium component.

As shown in Table 20 on page 175, the Modified Project's total estimated wastewater flow would be approximately 87,675 gallons per day (gpd), of which 21,675 gpd would be generated by the proposed Ancillary Uses. To provide a conservative analysis, this estimate is based on gross square footage (rather than floor area). Furthermore, it does not account for the wastewater reduction requirements of the City's Green Building Code, which calls for a 20-percent reduction in wastewater through the installation of water-conserving fixtures or through utilizing Los Angeles Plumbing Code-approved non-potable water systems within a building.

A Sewer Capacity Availability Request, included in Appendix B of the Infrastructure Report provided in Appendix R of this Addendum, was obtained from the City of Los Angeles Bureau of Sanitation to evaluate the capability of the existing wastewater system to serve the Modified Project's estimated wastewater flow. Based on the current approximate flow levels and design capacities in the sewer system, and the Modified Project's estimated wastewater flow, the City determined that the existing sanitary sewer lines that serve the Project Site would have an adequate capacity to accommodate the additional infrastructure demand created by the Modified Project. Sewer service for the Modified Project would be provided utilizing new or existing sewer connections to the existing sewer main that generally runs along the east side of South Coliseum Drive within the Project Site. Except for these sewer connection pipes, no upgrades to the existing sewer mainlines are anticipated as forecasted flow levels are all below the available capacity within each of the sewers that would serve the Project Site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Wastewater, of the Certified EIR), impacts with respect to wastewater infrastructure would be less than significant under the Modified Project. No mitigation measures are required.

As described above, the Hyperion Treatment Plant has a capacity of 450 mgd, and current wastewater flow levels are at 362 mgd. These flow levels include wastewater currently generated on the Project Site from the existing Sports Arena. Accordingly, the remaining available capacity at the Hyperion Treatment Plant is 88 mgd. As shown in Table 20, the Modified Project would generate a net increase wastewater flow from the Project Site of approximately 21,675 gpd, or approximately 0.022 mgd, beyond levels analyzed in the Certified EIR for the Original Stadium Project. The Modified Project's increase in average daily wastewater flow of 0.022 mgd would represent approximately 0.02 percent of the current 88 mgd remaining available capacity of the Hyperion Treatment

Table 20
Modified Project Event Day Wastewater Generation

Facility Description	Quantity	Daily Average Generation Rate (GPD)	Total Average (GPD)
Original Stadium Project Uses			
Stadium (seats filled)	22,000 seats	3/seat[a]	66,000
Additional Ancillary Uses Under Modified Project			
Conference Facilities	10,000 gsf	120/1,000 sf[b]	1,200
Museum	40,000 gsf	30/1,000 sf[c]	1,200
Team Store	15,000 gsf	50/1,000 sf[d]	750
Restaurant—Full Service	380 seats[e]	30/seat[f]	11,400
Restaurant—Fast Food	150 seats[g]	25/seat[h]	3,750
Retail	15,000 gsf	25/1,000 sf[i]	375
Office	25,000 gsf	120/1,000 sf[j]	3,000
Subtotal Additional Uses			*21,675*
Total Modified Project Demand—Typical Event Day (Stadium and Ancillary Uses)			87,675

gsf = gross square feet

GPD = gallons per day

[a] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "School: Stadium, Pavilion" rate.*

[b] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Conference Room of Office Building" rate.*

[c] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Museum (all areas)" rate.*

[d] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Museum (sales area)" rate.*

[e] *Assumes 60 percent of the restaurant area is available for patrons, with 20 sf of space per patron for quality/high end sit-down restaurant uses and 15 sf of space per patron for high-turnover sit-down restaurant uses.*

[f] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Restaurant: Full Service Indoor Seat" rate.*

[g] *Assumes 60 percent of the restaurant area is available for patrons, with 12 sf of space per patron.*

[h] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Restaurant: Fast Food Indoor Seat" rate.*

[i] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Retail Area (less than 100,000 SF)" rate.*

[j] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Office building w/Cooling tower" rate.*

Source: Langan Engineering and Environmental Services, Inc., 2015.

Plant. Therefore, the net increase in wastewater generation associated with the Modified Project could be accommodated by the existing capacity of the Hyperion Treatment Plant. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Wastewater, of the Certified EIR), impacts with respect to wastewater treatment capacity would be less than significant under the Modified Project. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to wastewater, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(b) Water

The Certified EIR for the Original Stadium Project concluded that impacts with respect to water supply, infrastructure, and treatment capacity would be less than significant under the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Water, of the Certified EIR). Specifically, the Certified EIR determined that the peak and average water demand from the Project Site would not increase with implementation of the Original Stadium Project as compared to existing conditions since average and maximum attendance levels at the Project Site under the Original Stadium Project would be substantially similar to existing conditions (i.e., operation of the Sports Arena). Therefore, the existing water infrastructure in the Project Site vicinity, as well as projected water supplies, would be able to accommodate the Original Stadium Project's water demand, and impacts related to water would be less than significant. The thresholds on which this analysis was based are stated on pages IV.I-17–IV.I-18 of the Certified EIR. The Certified EIR also determined that a Water Supply Assessment is not required for the Original Stadium Project pursuant to Senate Bill (SB) 610.

As discussed in the Certified EIR, water is currently supplied to the Project Site by the City of Los Angeles Department of Water and Power (LADWP). The Project Site is adjacent to several existing LADWP public water mains, including the following:

- 16-inch diameter water main in Figueroa Street;
- 61-inch diameter water main (Silver Lake Outlet Trunk Line) generally within and adjacent to Figueroa Street;
- 12-inch diameter main in Martin Luther King, Jr. Boulevard;
- 4-inch diameter main in Martin Luther King, Jr. Boulevard; and
- 8-inch diameter main in Hoover Street that extends to South Coliseum Drive.

The existing Sports Arena is currently serviced by an 8-inch lateral that runs parallel to the north side of South Park Drive, which stems from the 16-inch water main within Figueroa Street. Additionally, there are a minimum of eleven existing fire hydrants on Figueroa Street, Martin Luther King, Jr. Boulevard and South Coliseum Drive adjacent to the Project Site. Within the Project Site there is one private fire hydrant and multiple fire department connections. The private hydrant is located near the southwest corner of the existing Sports Arena footprint.

LADWP's water supply portfolio is comprised of four primary sources: the Los Angeles Aqueduct, local groundwater, purchased water from the Metropolitan Water District (MWD), and recycled water. In 2013, LADWP had an available water supply of 581,098 acre-feet, of which approximately 11 percent was from the Los Angeles Aqueduct, approximately 11 percent was from local groundwater, approximately 75 percent was from the MWD, and approximately 2 percent was from recycled water.[96] This amount does not represent the totality of water supplies available to LADWP; rather, LADWP's supply portfolio changes annually as purchases and withdrawals are made in response to projected demands within its service area. Thus, future anticipated supplies are represented in terms of projected demand. Water demand projections in five-year increments through 2035 are available in LADWP's 2010 Urban Water Management Plan (UWMP). As shown in Table 21 on page 178, the water demand for the City in 2018 (the Modified Project's buildout year) is expected to be approximately 637,120 acre-feet during average year hydrological conditions, approximately 675,340 acre-feet during a single-dry year, and approximately 675,400 acre-feet during a multiple-dry year.[97] As concluded in LADWP's 2010 UWMP, the projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2035, as well as the intervening years (i.e., 2018).

Additionally, as discussed in the Certified EIR, SB 610, codified in the California Water Code, Sections 10910 *et seq.*, became effective January 1, 2002. SB 610 requires counties and cities to consider the availability of adequate water supplies for certain new large development projects. These statutory provisions include requirements for both water supply assessments (WSAs) and UWMPs applicable to the California Environmental Quality Act (CEQA) process. Projects subject to CEQA requiring submittal of a WSA include the following:

- Residential developments of more than 500 dwelling units;

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[96] *Los Angeles Department of Water and Power, Water Resources Division, Water Supply Assessment for the 5901 Sunset Project, approved by the Board of Water and Power Commissioners on June 17, 2014.*

[97] *Year 2018 estimates are based on a linear interpolation of 2015–2020 data.*

Table 21
City of Los Angeles Water Demand Projections Based on Hydrological Conditions
(thousand AFY)

Hydrological Conditions	Years				
	2015	**2020**	**2025**	**2030**	**2035**
Average Year	614.8	652	675.6	701.2	710.8
Single Dry Year	651.7	691.1	716.1	743.2	753.4
	2011	**2012**	**2013**	**2014**	**2015**
Multi-Dry Year (2011–2015)	590	608.2	626.5	602.9	627.1
	2016	**2017**	**2018**	**2019**	**2020**
Multi-Dry Year (2016–2020)	647.1	661.2	675.4	644.6	665.1
	2021	**2022**	**2023**	**2024**	**2025**
Multi-Dry Year (2021–2025)	683	694.5	706.1	670.9	689.1
	2026	**2027**	**2028**	**2029**	**2030**
Multi-Dry Year (2026–2030)	707.9	720.1	732.4	696.1	715.2
	2031	**2032**	**2033**	**2034**	**2035**
Multi-Dry Year (2031–2035)	731.2	740.3	749.3	708.8	725

AFY = acre-feet per year

Source: Los Angeles Department of Water and Power, 2010 Urban Water Management Plan, Exhibits 11E–11K.

- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plant, or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- Mixed-use projects that include one or more of the above-identified categories; or

- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

As analyzed below, consistent with the conclusions of the Certified EIR, a Water Supply Assessment is not required for the Modified Project pursuant to SB 610.

(i) Construction

As stated in the Certified EIR, during construction, upgrades to water service connections may cause temporary impacts on the adjacent land uses during construction. Although new service connections may occasionally result in temporary interruptions in water services for existing customers, new water service installations are generally "hot tapped" so as to avoid water service interruption. Therefore, the Certified EIR concluded that temporary disruptions in local water service during the construction period of the Original Stadium Project are not anticipated, and impacts would be less than significant. This conclusion would not change under the Modified Project, which would implement the same standard practices to ensure that potential service interruptions are avoided to the extent feasible. Additionally, while construction of the Modified Project would result in a temporary and intermittent increase in potable water demand on the Project Site for activities such as dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, water line testing and flushing, and other short-term related activities, construction-related demand would be substantially less than the Modified Project's operational water demand, which is analyzed below. As demonstrated through the analysis below, the Modified Project's operational water demand would be within the City's available water supply, infrastructure, and treatment capacity. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Water, of the Certified EIR), impacts with respect to construction-related water demand would be less than significant under the Modified Project. No mitigation measures are required.

(ii) Operation

Water demand during operation is analyzed by estimating domestic, fire (sprinkler and fire hydrant), and irrigation uses. Fire flow demands require high flow rates and constitute a relatively short term demand. Domestic and irrigation flow demands require low to moderate flow rates and constitute long term demand. An analysis of the Modified Project's demands with respect to each of these categories is provided below.

Additionally, as set forth in the Certified EIR, the existing Sports Arena hosts a variety of sports and civic events as well as concerts and shows throughout the year. As described in Table II-1 on page II-6 of the Certified EIR, the Sports Arena has hosted an average of 69 annual events, including 60 events per year with an average attendance of

4,100 persons, 6 events per year with an average attendance of 13,500 and 3 events per year with an average attendance of 37,800. Based on these data, Sports Arena events generate an average annual attendance of approximately 440,400 persons. Like the Original Stadium Project, the Modified Project proposes a 22,000-seat MLS stadium. Therefore, peak day attendance under the Modified Project is also expected to be similar to peak historic attendance levels at the Sports Arena. However, based on preliminary programming data provided by LAFC, annual attendance in the Modified Project's stadium could range from 628,500 persons to a maximum of approximately 1,403,500 persons. In addition to peak day attendance, these annual attendance estimates are relevant for determining the Modified Project's annual water demand as it relates to SB 610 requirements, as discussed below.

Fire Flow

Los Angeles Fire Code (Fire Code) Chapter 5, Section 507, establishes fire flow standards by development type. The Modified Project is within the Industrial and Commercial category, which has a required fire flow of 6,000 to 9,000 gallons per minute (gpm) from four to six fire hydrants flowing simultaneously (1,500 gpm per hydrant). The Fire Code also requires hydrants to be spaced to provide adequate coverage of the building exterior and deliver a minimum pressure of 20 pounds per square inch (psi) at full flow. Industrial and Commercial uses require one hydrant per 80,000 square feet of land area with 300 feet distance between hydrants on roads and fire lanes. Required hydrant types include 2.5-inch by 4-inch double fire hydrants or 4-inch by 4-inch double fire hydrants. Fire hydrant demands therefore act as the baseline for any water system upgrades.

The Certified EIR stated that the Original Stadium Project would be required to comply with LAFC and building code fire flow requirements for the Project Site. Based on information in the Modified Project Infrastructure Report, the hydrant coverage around the Project Site is considered adequate pursuant to LADWP and LAFD standards. Existing hydrant and/or fire department connections within the Project Site may be need to be removed and replaced as required if necessary as part of the Sports Arena demolition or if the City requires increased coverage around the Modified Project. Based on recent correspondence from LADWP, which is included in Appendix A of the Modified Project Infrastructure Report, the static water pressure at 3939 Figueroa Street is 89 psi in the high pressure system and 71 psi in the low pressure systems. Therefore, there are no known existing deficiencies in the water system that would preclude the system from being able to provide the required fire flow to the Modified Project. Upon finalization of the Modified Project design, a pressure flow report would be requested from LADWP to ensure that existing water pressure is sufficient to serve the Modified Project. Furthermore, as stated in Section IV.N.a, Public Services—Fire Protection, on page 137 of this Addendum, based on its preliminary review of the Modified Project, the LAFD has not identified any

substantial deficiencies in the fire flow infrastructure that serves the Project Site, or in the design of the Modified Project, that would prohibit the Modified Project from meeting applicable Fire Code requirements. Notwithstanding, as with the Original Stadium Project, the final fire-flow requirement for the Modified Project would be determined by the LAFD and the Applicant would be responsible for constructing any necessary infrastructure upgrades. Thus, with adherence to LAFD and Fire Code requirements for the Project Site, impacts with respect to fire flow would be less than significant, consistent with the conclusions of the Certified EIR. No mitigation measures are required.

Domestic and Irrigation Water Demand

As previously discussed, the Certified EIR determined that the peak and average water demand for the Project Site would not increase with implementation of the Original Stadium Project as compared to existing conditions since average and maximum attendance levels at the Project Site under the Original Stadium Project would be substantially similar to existing conditions. Therefore, the Certified EIR concluded that existing water infrastructure in the vicinity of the Project Site, as well as projected water supplies, would be able to accommodate the Original Stadium Project's water demand, and impacts related to water supply would be less than significant. For the same reason, the Certified EIR also determined that the Original Stadium Project would not require a Water Supply Assessment (WSA) pursuant to SB 610.

Operational impacts related to water are assessed in terms of both peak daily consumption (in relation to infrastructure capacity) and annual consumption (in relation to water supplies and SB 610 requirements). With regard to peak daily consumption, as is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of approximately 22,000 seats, which is within the historic maximum attendance levels of the Sports Arena (i.e., up to 55,132 attendees, as shown in Table II-3 in the Certified EIR). Therefore, potential water supply and infrastructure capacity impacts with respect to the stadium portion of the Modified Project during a maximum activity day (i.e., event day) would not represent a substantial increase compared to existing conditions, consistent with the Certified EIR's analysis.

However, additional event-day water consumption beyond levels analyzed in the Certified EIR may result from operation of the Ancillary Uses proposed as part of the Modified Project. Although the estimated water consumption of the stadium would not change compared to levels analyzed under the Certified EIR, for informational purposes, and to be consistent with LADWP methodology for determining pipeline capacity, this analysis presents the estimated peak daily water consumption of the entire Modified Project, including the stadium component. Furthermore, as discussed above, while maximum event day attendance in the stadium portion of the Modified Project would be

substantially the same as under the Original Stadium Project, annual attendance at the proposed stadium could increase under the Modified Project as compared to levels projected under the Original Stadium Project. Therefore, the analysis below also estimates the annual water consumption for the entire Modified Project in order to determine the Modified Project's potential water supply impacts, or whether the Modified Project would result in the need for a WSA in accordance with SB 610.

As shown in Table 22 on page 183, the Modified Project's total estimated water demand on an event day would be approximately 94,322 gpd, of which 72,647 gpd would be associated with the stadium and 21,675 gpd would be associated with the proposed Ancillary Uses. To provide a conservative analysis, this estimate is based on gross square footage (rather than floor area). Furthermore, it conservatively does not account for implementation of Project Design Feature P-1, which reflects the water conservation commitment of the Modified Project. Specifically, the Modified Project would commit to reducing indoor potable water demand by at least 20 percent below 2013 CALGreen requirements. Additionally, the Modified Project would implement Mitigation Measure MM I.2-1 in the Certified EIR, which reflects DWP requirements for new construction. Mitigation Measure MM I.2-1 has been incorporated into the MMP for the Modified Project (see Appendix A to this Addendum) with revisions to reflect current DWP requirements.

The total Modified Project demand of 94,322 gpd on an event day converts to a peak flow demand of approximately 66 gallons per minute (gpm). Utilizing a peaking factor of 3, the peak demand on an event day would be 198 gpm. This is significantly lower than the fire flow requirement of 1,500 gpm from a single hydrant discussed above. Thus, sufficient infrastructure capacity would be available to accommodate the Modified Project's daily water demand on an event day. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Water, of the Certified EIR), impacts with respect to water infrastructure would be less than significant under the Modified Project. No mitigation measures are required.

Annual water demand has also been evaluated to determine whether the Modified Project would result in the need for a WSA in accordance with SB 610. As summarized above and described in detail in the Certified EIR, existing events within the Sports Arena have generated an average annual attendance of 440,400 persons. Using a per patron water demand rate of 8.8778 units, consistent with LADWP's methodology for analyzing annual water demand associated with professional sports stadiums,[98] this average

[98] *Los Angeles Department of Water and Power, Water Supply Assessment for the Convention and Event Center Project, January 3, 2012.*

Table 22
Modified Project Event Day Water Consumption

Facility Description	Quantity	Daily Average Consumption Rate (GPD)	Total Average (GPD)
Original Stadium Project Uses			
Stadium (seats filled)	22,000 seats	3/seat[a]	66,000
Landscape Irrigation	96,508 sf	68.87/1,000 sf[b]	6,647
Subtotal			72,647
Additional Uses Under Modified Project			
Conference Facilities	10,000 gsf	120/1,000 sf[c]	1,200
Museum	40,000 gsf	30/1,000 sf[d]	1,200
Team Store	15,000 gsf	50/1,000 sf[e]	750
Restaurant—Full Service	380 seats[f]	30/seat[g]	11,400
Restaurant—Fast Food	150 seats[h]	25/seat[i]	3,750
Retail	15,000 gsf	25/1,000 sf[j]	375
Office	25,000 gsf	120/1,000 sf[k]	3,000
Subtotal Additional Uses			*21,675*
Total Modified Project Demand—Event Day (Stadium and Ancillary Uses)			94,322

sf = square feet

gsf = gross square feet

GPD = gallons per day

[a] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "School: Stadium, Pavilion" rate.*

[b] *Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7, Model Water Efficient Landscape Ordinance.*

[c] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Conference Room of Office Building" rate.*

[d] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Museum (all areas)" rate.*

[e] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Museum (sales area)" rate.*

[f] *Assumes 60 percent of the restaurant area is available for patrons, with 20 sf of space per patron for quality/high end sit-down restaurant uses and 15 sf of space per patron for high-turnover sit-down restaurant uses.*

[g] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Restaurant: Full Service Indoor Seat" rate.*

[h] *Assumes 60 percent of the restaurant area is available for patrons, with 12 sf of space per patron.*

[i] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Restaurant: Fast Food Indoor Seat" rate.*

[j] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Retail Area*

Table 22 (Continued)
Modified Project Event Day Water Consumption

Facility Description	Quantity	Daily Average Consumption Rate (GPD)	Total Average (GPD)
(less than 100,000 SF)" rate.			
[k] *From the City of Los Angeles Bureau of Engineering Sewer Generation Rates (2012), "Office building w/Cooling tower" rate.*			
Source: Langan Engineering and Environmental Services, Inc., 2015.			

annual attendance generates an annual demand for approximately 3.9 million gallons (11.97 acre-ft) of water. As discussed above, based on preliminary programming data provided by LAFC, annual attendance would range from 628,500 persons to a maximum of approximately 1,403,500 persons under the Modified Project. Based on water demand from the maximum annual attendance projected for events, the proposed Ancillary Uses, and use of irrigation, the annual water demand for the Modified Project was estimated and is summarized in Table 23 on page 185. As shown therein, the Modified Project would result in a net annual water demand of approximately 15,094,769 gallons, or 46 acre-feet. This estimate is highly conservative in that it is based on the following assumptions:

- Maximum number of potential events occurring at the proposed stadium with maximum potential attendance;
- Irrigation occurring four days a week, year-round, for each square foot of landscaped surface; and
- Gross square feet rather than floor area for the proposed Ancillary Uses.

As shown in Table 21 on page 178, the water demand for the City in 2018 (the Modified Project's buildout year) is expected to be approximately 637,120 acre-feet during average year hydrological conditions, approximately 675,340 acre-feet during a single-dry year, and approximately 675,400 acre-feet during a multiple-dry year.[99] As concluded in LADWP's 2010 UWMP, the projected water demand for the City would be met by the available supplies during an average year, single-dry year, and multiple-dry year through the year 2035, as well as the intervening years (i.e., 2018). The Modified Project's estimated net increase in water demand of approximately 46 acre-feet per year would comprise less than 0.008 percent of the water demand for the City in 2018 during an

[99] *Year 2018 estimates are based on a linear interpolation of 2015–2020 data.*

Table 23
Modified Project Annual Water Consumption

Event	Max Quantity (days)	Max Capacity/ Unit	Daily Average Consumption Rate (GPD)	Total (gallons)
MLS Regular Season Games	20	22,000	8.8778/patron[a]	3,906,240
MLS Playoff Game[b]	3	22,000	8.8778/patron	585,936
MLS/SUM Special/Preseason Game	2	22,000	8.8778/patron	390,624
CONCACAF soccer games	4	22,000	8.8778/patron	781,248
US Men and Women National Team	1	22,000	8.8778/patron	195,312
Euro/Mexican Exhibition	3	22,000	8.8778/patron	585,936
Concerts Tier 1	20	22,000	8.8778/patron	3,906,240
Concerts Tier 2	20	8,500	8.8778/patron	1,509,226
Community Events	15	4,500	8.8778/patron	599,251
Ancillary Uses	365	Varies[c]	Varies[c]	7,911,375
Landscape Irrigation[d]	208	96,508 sf	68.87/1,000 sf	1,382,368

	Gallons	acre-ft
Total Annual Water Demand for Programmed Events (88 days)	12,460,013	38.3
Total Annual Water Demand—Ancillary Uses	7,911,375	24.3
Total Annual Water Consumption—Landscape Irrigation	1,382,368	4.2
Estimated total Annual Water Demand Under Modified Project	21,753,756	67
Estimated Water Conservation (see Table 24 on page 186)	(2,749,204)	(8.4)
Historic Average Annual Water Demand (to be removed)	(3,909,783)[e]	(12.0)
Estimated Net Increase in Annual Water Demand Under Modified Project	15,094,769	46

sf = square feet

GPD = gallons per day

[a] *Los Angeles Department of Water and Power, Water Supply Assessment for the Convention and Event Center Project, January 3, 2012.*

[b] *In the event that the MLS team advances to the playoffs.*

[c] *See Table 22 on page 183.*

[d] *Assumes irrigation occurs 4 days per week.*

[e] *440,400 annual patrons * 8.8778 gal per patron*

Source: Langan Engineering and Environmental Services, Inc., 2015.

average year, single-dry year, and multiple-dry year period. Therefore, the Modified Project would be well within the available and projected water supplies for normal, single-dry, and multiple-dry years for the Modified Project build-out year, as such, LADWP would be able to meet the water demand for the Modified Project as well as existing and planned water demands of its future service area.

Table 24
Modified Project Estimated Annual Water Conservation

Event	Unit	Total Uses	Water Saving Factor (gal/use)	Total (gallons)
Stadium				
Water Closet	88 days	11,000	0.32	309,760
Urinals	88 days	11,000	0.50	484,000
Ancillary Uses	119,000 gsf	365 days	20%[a]	1,582,275
Landscape Irrigation				
Drip and Bubblers	96,508 sf	208 days	18.59/1,000 sf[b]	373,169
Estimated Annual Water Conservation—Irrigation Only				**373,169**
Total Estimated Annual Water Conservation in gallons/year				**2,749,204**
Total Estimated Annual Water Conservation in acre-ft/year				**8.4**

sf = square feet

gsf = gross square feet

GPD = gallons per day

[a] *Conservatively assumes code-required savings pursuant to City of Los Angeles Green Building Code (LAMC Chapter IX, Article 9). Pursuant to Project Design Feature P-1, the Modified Project would exceed this reduction.*

[b] *Assumes 27-percent reduction. Los Angeles Department of Water and Power, Water Supply Assessment for the Convention and Event Center Project, January 3, 2012.*

Source: Langan Engineering and Environmental Services, Inc., 2015.

LADWP's water supplies are facing challenges due to environmental concerns and litigation associated with LADWP's sources of water supply. Additionally, changes in hydrological conditions due to climate change could also have an impact on MWD's water supplies. However, along with MWD's water management and reliability initiatives, LADWP is committed to, as outlined in the 2010 Urban Water Management Plan, providing a reliable water supply for the City. The 2010 Urban Water Management Plan takes into account the realities of climate change and the concerns of drought and dry weather and notes that the City will meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. The 2010 Urban Water Management Plan addresses the current and future State Water Project supply shortages. However, the 2010 Urban Water Management Plan specifically concludes that MWD's actions in response to the threats to the State Water Project will ensure continued reliability of its water deliveries. Furthermore, by focusing on demand reduction, LADWP will ensure that long-term dependence on MWD supplies will not be exacerbated by potential future

shortages. Additionally, water conservation and recycling will play an increasing role in meeting future water demands.

With regard to SB 610 requirements, conservatively using the Bureau of Sanitation wastewater generation rate for a one-bedroom dwelling unit of 110 gallons per day per dwelling unit, 500 residential units generate a demand of approximately 20,075,000 gallons of water per year, or 61.6 acre-ft. As discussed above, the net annual water demand for the Modified Project is well below this number. As such, consistent with the conclusions of the Certified EIR, a Water Supply Assessment is not required for the Modified Project pursuant to SB 610.

Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.2, Public Utilities—Water, of the Certified EIR), operational impacts with respect water supply and infrastructure capacity would be less than significant under the Modified Project. No mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to water supply and infrastructure capacity, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(iii) Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to water:

PDF P-1: The Modified Project would reduce indoor potable water demand by at least 20 percent below Section 5.303.3 of the 2013 California Green Building Standards Code—January 1, 2014, Errata.

The following mitigation measure was included in the Certified EIR to further reduce the Original Stadium Project's less-than-significant impacts with respect to water. This Mitigation Measure would continue to be implemented as part of the Modified Project and has been incorporated into the MMP for the Modified Project included in Appendix A of this Addendum, but has been revised as follows to reflect current City conservation requirements:

EIR Mitigation Measure MM I.2-1: The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and

overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season). In addition, the Department of Water and Power requires the following conservation measures for all new development in the City of Los Angeles:

- High-efficiency toilets (1.28 gallons per flush or less, includes dual flush);
- High-efficiency dual flush toilets in single-use bathrooms;
- High-efficiency urinals (~~0.5~~ 0.125 gallons per flush or less, includes waterless urinals);
- Restroom faucet flow rate of ~~1.5~~ 0.35 gallons per minute or less;
- Public restroom self-closing faucets;
- Showerhead flow rate of ~~2.0~~ 1.5 gallons per minute or less;
- Limit of one showerhead per shower stall;
- High-efficiency clothes washers (water factor of 6.0 or less);
- High-efficiency dishwashers (ENERGY STAR rated);
- Use of tankless and on-demand water heaters as feasible;
- Cooling towers must be operated at a minimum of 5.5 cycles of concentration;
- Require onsite water recycling systems for wastewater discharge for commercial laundries, dye houses, food processing, certain manufacturing operations, etc. (subject to a payback threshold of five years or less). Mandate water recycling system for all new car wash facilities.
- Strict prohibition of single-pass cooling; (Note: Single-pass cooling refers to the use of potable water to extract heat from process equipment)
- Irrigation system requirements:
  - Weather-based irrigation controller with rain shutoff;
  - Flow sensor and master valve shutoff (large landscapes);
  - Matched precipitation (flow) rates for sprinkler heads;
  - Drip/microspray/subsurface irrigation where appropriate;
  - Minimum irrigation system distribution uniformity of 75 percent;

  - Proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials;
  - Use of landscape contouring to minimize precipitation runoff;
- Metering:
  - All irrigated landscapes of 5,000 square feet or more require separate metering or submetering;
- Mandated use of recycled water (where available) for appropriate end uses (irrigation, cooling towers, sanitary);
- Standard Urban Stormwater Mitigation Plan (SUSMP): Compliance with all City of Los Angeles SUSMP requirements, and encouraging implementation of Best Management Practices that have stormwater recharge or reuse benefits.

(c) Solid Waste

The Certified EIR for the Original Stadium Project determined that the amount of solid waste generated during construction and operation of the Original Stadium Project would fall within the available permitted capacity of area landfills and recycling centers (refer to Section IV.I.4, Public Utilities—Solid Waste, of the Certified EIR). Therefore, the Certified EIR concluded that solid waste impacts associated with construction and operation would be less than significant. The thresholds on which this analysis was based are stated on pages IV.I-30–IV.I-31 of the Certified EIR. Although impacts would be less than significant, the Certified EIR included Mitigation Measures I.4-1 and I.4-2, which requires implementation of recycling programs during construction and operation, respectively, to further ensure that potential solid waste impacts remain less than significant.

As stated in the Certified EIR, construction of the Original Stadium Project would require the demolition of the existing Sports Arena. The Certified EIR estimated that approximately 5.4 million cubic feet of debris would be generated from this activity. Construction debris from building activities would also be generated included concrete, asphalt, wood, drywall, metals, and a variety of other miscellaneous and composite materials. The Certified EIR concluded that the amount of solid waste generated during construction would fall within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be less than significant under the Original Stadium Project.

Like the Original Stadium Project, the Modified Project would require the demolition of the existing Sports Arena. The estimated amount of demolition debris from the Sports Arena (5.4 million cubic feet of debris according to the Certified EIR) would not change

under the Modified Project. As shown in Table 25 on page 191, construction of the Modified Project's stadium and Ancillary Uses would generate an estimated 1,478 tons of solid waste. Combined with the demolition of the Sports Arena, which was addressed in the Certified EIR but is provided herein for informational purposes, Modified Project demolition and construction activities would generate a total of 121,478 tons of solid waste. This estimate is conservative in that it does not account for implementation of Project Design Feature P-2, which reflects the Modified Project's commitment to utilize building materials with at least 20 percent recycled-contents. Additionally, pursuant to revised Mitigation Measure I.4-1, the Modified Project would implement a construction waste management plan to achieve a minimum 75-percent diversion from landfills, which exceeds the City of Los Angeles Green Building Code (Ordinance No. 181,480) requirement of 50 percent. Mitigation Measure I.4-1 from the Certified EIR has been incorporated into the Modified Project's MMP included as Appendix A to this Addendum, and has been revised to reflect the specific diversion rate that would be implemented under the Modified Project. Therefore, following the implementation of this measure, a total of approximately 30,370 tons of construction and demolition waste from the Modified Project would be disposed of in area landfills that accept construction and demolition waste generated within the City of Los Angeles. As shown in Table 26 on page 192, the combined estimated remaining permitted capacity of these landfills is 156.28 million tons. The Modified Project's estimated generation of construction and demolition waste would represent approximately 0.02 percent of this total. Therefore, the landfills that serve the Project Site would have sufficient capacity to accommodate the Modified Project's construction and demolition-related solid waste disposal needs. Accordingly, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.4, Public Utilities—Solid Waste, of the Certified EIR), impacts with respect to solid waste generation during construction would be less than significant under the Modified Project, and would be further reduced through implementation of Mitigation Measure I.4-1 and Project Design Feature P-2. No additional mitigation measures are required.

With respect to solid waste generated during operation, the Certified EIR concluded that implementation of the Original Stadium Project would not result in a substantial change in the amount of solid waste generated at the Project Site on an event day because the Original Stadium Project would redevelop the Project Site with the same general use (i.e., sports stadium) that currently exists on-site, and maximum attendance of the stadium would be within historic attendance levels of the Sports Arena. Therefore, the Certified EIR concluded that any additional solid waste generated by the Original Stadium Project would not result in significant impacts on solid waste services.

As is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of 22,000 seats. Therefore, impacts associated with the stadium portion of the Modified

Table 25
Demolition and Construction Waste Generated by the Modified Project

Land Use	Size (gsf)	Generation Rate[a] (lbs/sf)	Total (tons)
Demolition			
Sports Arena	—	—	120,000[b]
Construction			
MLS Stadium	641,000	3.89	1,247
Ancillary Uses			
Conference Facilities	10,000	3.89	19
Museum	40,000	3.89	78
Team Store	15,000	3.89	29
Retail	15,000	3.89	29
Restaurant	14,000	3.89	27
Office	25,000	3.89	49
Subtotal for Construction	—	—	*1,478*
Total (prior to recycling)			**121,478**
Total (after 75 percent recycling)			**30,370**

gsf = gross square feet

lbs = pounds

[a] *U.S. Environmental Protection Agency, Report No. EPA530-98-010, Characterization of Building-Related Construction and Demolition Debris in the United States, June 1998.*

[b] *Based on information in the Certified EIR (i.e., 5.4 million cubic feet) and applying a conversion factor of 1,200 lbs/cubic yard for construction and demolition waste (Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2013 Annual Report, Permitted Large Volume Solid Waste Transfer and Processing Facilities in Los Angeles County in 2013, Appendix E-4).*

Source: Eyestone Environmental, 2015.

Project would not change compared to levels analyzed in the Certified EIR. However, the Modified Project would include additional Ancillary Uses, which would operate in conjunction with the stadium on event days and could increase solid waste generation on maximum generation days as compared to levels analyzed in the Certified EIR. As shown in Table 27 on page 193, the Modified Project's Ancillary Uses would have the potential to generate an additional 348 tons of solid waste per year. This estimate is conservative as it does not account for the solid waste reduction features provided for in Project Design Feature P-3, below, or implementation of Mitigation Measure I.4-2 in the Certified EIR, which requires implementation of an on-site recycling plan to achieve an operational diversion rate of at least 40 percent. These measures are anticipated to substantially reduce solid waste generated by the Modified Project.

Table 26
Solid Waste Disposal and Estimated Remaining Capacity for Landfills That Serve the City of Los Angeles[a]

Landfill	Accepts Construction & Demolition Waste (Y/N)	Location	2013 Total Disposal (million tons)[b]	Estimated Remaining Permitted Capacity as of 12/31/13 (million tons)[c]
Class III				
Antelope Valley[d]	Y	Palmdale	0.463	12.01
Chiquita Canyon[e]	Y	Unincorporated	1.029	2.94
Lancaster[f]	Y	Lancaster	0.080	13.20
Sunshine Canyon City/County[g]	Y	Unincorporated	2.262	65.79
Class III Landfill Subtotal			*3.834*	*93.94*
Inert				
Azusa Land Reclamation	Y	Azusa	0.143	62.34
Inert Landfill Subtotal			*0.143*	*62.34*

[a] *Does not include the Calabasas Landfill, which is limited to accepting waste from within the Calabasas Wasteshed (as defined by Los Angeles County Ordinance No. 91-0003), which is composed of the incorporated cities of Hidden Hills, Agoura Hills, Westlake Village and Thousand Oaks; that portion of the City of Los Angeles bordered by the northerly line of Township 2 North on the north, Interstate Highway 405 on the east, Sunset Boulevard and the Pacific Ocean on the south, and the City boundary on the west; and certain unincorporated areas in the Counties of Los Angeles and Ventura.*

[b] *Disposal quantities are based on actual tonnages reported by owners/operators of permitted solid waste disposal facilities to the Los Angeles County Department of Public Works' Solid Waste Information Management System.*

[c] *Estimated Remaining Permitted Capacity is based on landfill owner/operator's response in a written survey conducted by the Los Angeles County Department of Public Works in May 2013 as well as site-specific permit criteria established by local land use agencies.*

[d] *Proposed expansion approved in 2011, which increased capacity by approximately 9 million tons.*

[e] *Proposed expansion pending, which would increase capacity by approximately 48 million tons. Land Use Permit (LUP) limits waste disposal to 30,000 tons per week. LUP expires November 24, 2019.*

[f] *A new Conditional Use Permit (CUP) that allowed usage of the remaining design capacity of 12.3 million tons became effective on December 14, 2011.*

[g] *The combined Sunshine Canyon City/County Landfill became effective December 31, 2008, based on a memorandum of understanding between the City of Los Angeles and the County.*

Source: Eyestone Environmental, 2015, based on information from County of Los Angeles, Department of Public Works; Los Angeles County Integrated Waste Management Plan 2013 Annual Report, May 2015.

As shown in Table 26, based on information provided in the Los Angeles County Integrated Waste Management Plan 2013 Annual Report, the total combined remaining disposal capacity for the Class III landfills that accept municipal solid waste generated

Table 27
Additional Solid Waste Potentially Generated by the Modified Project

Land Use	Size (sf)	Employees[a]	Solid Waste Generation Factor[b] (tons/unit/year)	Waste Generation (tons/year)
Conference Facilities	9,000	24	0.37	9
Office	21,250	102	0.37	38
Museum	36,000	49	1.87	92
Team Store and Other Retail	27,750	75	1.52	114
Restaurant	11,900	32	2.98	95
Total				**348**

sf = square feet

[a] *Refer to Table X in Section IV.M, Population, Housing, and Employment, of this Addendum for the calculation of the Modified Project's employment estimate.*

[b] *City of Los Angeles Bureau of Sanitation, City Waste Characterization and Quantification Study, July 2002. Waste generation factors are for: "Services—Business" (Conference Facilities and Office uses); "Other Industries" (Museum); "Retail—Remainder" (Team Store and Other Retail); and "Retail—Restaurants" (Restaurants).*

Source: Eyestone Environmental, 2015.

within the City of Los Angeles is estimated to be approximately 93.94 million tons. The estimated additional generation of 348 annual tons of solid waste from the Modified Project's Ancillary Uses would represent approximately 0.0004 percent of this total each year. Furthermore, the additional solid waste disposal associated with the Modified Project's Ancillary Uses would represent approximately 0.009 percent of the City's annual solid waste disposal quantity at these landfills in 2013 (i.e., approximately 3.8 million tons, as shown in Table 26 on page 192). Therefore, the Modified Project's estimated increase in solid waste generation as compared to levels analyzed in the Certified EIR would increase the City's solid waste stream by a negligible amount, and the landfills that serve the Project Site would have sufficient capacity to accommodate the Modified Project's operational solid waste disposal needs. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.4, Public Utilities—Solid Waste, of the Certified EIR), impacts with respect to solid waste generation during operation would be less than significant under the Modified Project, and would be further reduced through implementation of Mitigation Measure I.4-2. No additional mitigation measures are required.

Based on the analysis above, the Modified Project would not result in any new significant impacts with respect to solid waste, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(i) Project Design Features and Mitigation Measures

The Modified Project would implement the following Project Design Features related to solid waste:

PDF P-2: A minimum of 20 percent of all Construction Specifications Institute (CSI) divisions three through ten building materials and products for development, measured by cost, shall consist of pre-consumer and post-consumer recycled content and shall be manufactured within a 500-mile radius of the Project Site.

PDF P-3: During operation, the Modified Project shall:

- Divert solid waste from landfills through robust recycling, the donation of durable goods, and implementing a front-of-house composting program that includes sourcing biodegradable concessions packaging. The composting program shall incorporate appropriate odor management practices to reduce odor emissions at adjacent receptors. Examples of such practices include nutrient balance, temperature, moisture content, and aeration control.
- Utilize a minimum of 90 percent of on-going consumable paper, janitorial, and lighting products that meet the following criteria:
  - Bio-based materials and/or chemicals
  - Minimal presence of exposure to potentially harmful chemicals
  - No Volatile Organic Compounds (VOC)
  - Biodegradable
  - Non-toxic
  - Low flammability

The following mitigation measures were included in the Certified EIR to further reduce the Original Stadium Project's less-than-significant impacts with respect to solid waste. These Mitigation Measures would continue to be implemented as part of the Modified Project and have been incorporated into the MMP for the Modified Project included in Appendix A of this Addendum, but have been revised as follows to reflect the specific solid waste diversion commitment of the Modified Project:

EIR Mitigation Measure MM I.4-1: The ~~Project~~ Applicant shall develop a construction and demolition debris recycling program to divert a minimum of 75 percent of construction related solid waste and demolition debris from area landfills.

EIR Mitigation Measure MM I.4-2: The ~~Project~~ Applicant shall develop an operational project recycling plan that includes the design and allocation of recycling collection and storage space in the Project. The Applicant shall demonstrate through annual compliance reports submitted to the City of Los Angeles Department of Public Works, Bureau of Sanitation, an annual operational diversion rate of at least 40 percent.

(d) Energy

The Certified EIR for the Original Stadium Project concluded that impacts with respect to energy conservation would be less than significant under the Original Stadium Project (refer to Section IV.I.3, Public Utilities—Energy Conservation, of the Certified EIR). The thresholds on which this analysis was based are stated on page IV.I-23 of the Certified EIR. Specifically, the Certified EIR determined that energy demands during construction would be typical of construction projects for similarly sized projects and would not necessitate additional energy facilities or distribution of infrastructure. During operation, peak and average electricity and natural gas demand from the Project Site would not increase compared to the existing conditions since average and maximum attendance levels at the Project Site under the Original Stadium Project would be substantially similar to existing conditions (i.e., operation of the Sports Arena). Therefore, the Certified EIR concluded that the existing electricity and natural gas infrastructure and supplies would be able to accommodate the Original Stadium Project's energy demand, and impacts related to energy conservation would be less than significant.

As discussed in the Certified EIR, electricity is supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP). LADWP generates power from a variety of energy sources including hydropower, coal, gas, nuclear sources, and renewable resources such as wind, solar, and geothermal sources. According to LADWP's 2014 Power Integrated Resource Plan, LADWP has a net dependable generation capacity greater than 7,639 megawatts (MW).[100] During the 2013 fiscal year, the most recent year for which data is available, LADWP delivered a total of approximately 23.5 million megawatt-hours (MWh) of electricity to its customers.[101] Approximately 23 percent of

[100] *LADWP, 2014 Power Integrated Resource Plan, Section 1, Introduction, page 17, www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=10f8usiiei_38&_afrLoop=1466297694517747, accessed August 11, 2015.*

[101] *LADWP, Power Facts and Figures, www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factand figures?_adf.ctrl-state=10f8usiiei_38&_afrLoop=1466462244888847, accessed August 11, 2015.*

LADWP's 2013 electricity purchases were from renewable sources, compared to 19 percent statewide.[102]

The Project Site is served by multiple underground electrical service conduit distribution systems along South Coliseum Drive, Martin Luther King, Jr. Boulevard, and Figueroa Street. There is also a series of above-ground power poles along the east side of Hoover Street. These poles support overhead power lines along Hoover Street and east along the southern limits of the Project Site, terminating just east of the existing VIP parking lot. At the point of termination, two underground conduits stem from the power pole, providing primary power to the Sports Arena.

As discussed in the Certified EIR, natural gas is supplied to the Project Site by the Southern California Gas Company (SCG). SCG receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[103] Gas supply available to SCG from all sources was approximately 2.8 billion cubic feet (cf) per day in 2013 (the most recent year for which data are available).[104]

The Project Site is adjacent to several existing SCG mains as follows:

- 3-inch diameter lateral servicing the existing Sports Arena;
- 4-inch diameter main in South Coliseum Drive just north of the intersection with South Park Drive; and
- 12-inch diameter gas main in Martin Luther King, Jr. Boulevard.

Energy demands are also generated by mobile sources. According to the California Energy Commission, transportation accounts for nearly 40 percent of California's total energy consumption.[105] In 2013, California consumed 14.53 billion gallons of gasoline and

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[102] *LADWP, 2014 Power Integrated Resource Plan, Table D-1, LADWP's 2013 Power Content Label, page D-18, www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=10f8usiiei_38&_afrLoop=1466297694517747, accessed August 11, 2015.*

[103] *California Gas and Electric Utilities, 2014 California Gas Report, pages 76-77, www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf, accessed August 11, 2015.*

[104] *California Gas and Electric Utilities, 2014 California Gas Report, page 30, www.socalgas.com/regulatory/documents/cgr/2014-cgr.pdf, accessed August 11, 2015.*

[105] *California Energy Commission, 2013 Integrated Energy Policy Report, www.energy.ca.gov/2013publications/CEC-100-2013-001/CEC-100-2013-001-CMF.pdf, accessed August 11, 2015.*

2.74 billion gallons of diesel fuel.[106] Petroleum-based fuels currently account for 92 percent of California's transportation energy sources.[107] Over the last decade California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled (VMT). Accordingly, gasoline consumption in California has declined. The California Energy Commission predicts that the demand for gasoline will continue to decline over the next ten years and there will be an increase in the use of alternative fuels.[108]

(i) Construction

As stated in the Certified EIR, during construction, energy would be consumed during the demolition, excavation, and construction phases of the Original Stadium Project. The Certified EIR determined that energy demands during construction would be typical of construction projects of similar types and sizes and would not necessitate additional energy facilities or distribution infrastructure. Therefore, the Certified EIR concluded that energy demands during construction would be less than significant. The Modified Project includes design changes to the proposed stadium and additional construction associated with the proposed Ancillary Uses. Therefore, the Modified Project could result in additional energy consumption during the construction phases beyond levels analyzed in the Certified EIR. Accordingly, the analysis below presents an estimate of the construction-related energy consumption of the entire Modified Project, including the proposed stadium.

As shown in Table 28 on page 198, approximately 59,767 kWh of electricity, approximately 121,516 gallons of gasoline, and approximately 217,244 gallons of diesel fuel would be consumed during Modified Project construction. Electricity would be consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. Overall, construction activities associated with the Modified Project would require limited electricity use that would not have an adverse impact on available electricity supplies. Construction activities typically do not involve the consumption of natural gas. The petroleum-based fuel use summary provided in Table 28 represents the highest amount of energy that could be

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[106] *California Board of Equalization, Net Taxable Gasoline Gallons 10 Year Report, www.boe.ca.gov/sptaxprog/reports/MVF_10_Year_Report.pdf; and Net Taxable Diesel Gallons 10 Year Report, www.boe.ca.gov/sptaxprog/reports/Diesel_10_Year_Report.pdf, accessed August 11, 2015.*

[107] *California Energy Commission. 2015–2016 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, November 2014, www.energy.ca.gov/2014publications/CEC-600-2014-009/CEC-600-2014-009-SD.pdf, accessed August 11, 2015.*

[108] *California Energy Commission, 2013 Integrated Energy Policy Report, www.energy.ca.gov/2013publications/CEC-100-2013-001/CEC-100-2013-001-CMF.pdf, accessed August 11, 2015.*

Table 28
Summary of Energy Use During Modified Project Construction

	Unit	Modified Project
Electricity		
Water Conveyance	kWh	59,767
Construction Activities	kWh	N/A[b]
Total	**kWh**	**59,767**
Gasoline		
On-Road Vehicles	Gallons	121,516
Off-Road Equipment	Gallons	0
Total	**Gallons**	**121,516**
Diesel		
On-Road Vehicles	Gallons	102,393
Off-Road Equipment	Gallons	114,852
Total	**Gallons**	**217,244**

kWh = kilowatt hours

[a] *Energy usage during Project construction is calculated for the duration of the construction period.*

[b] *Electricity usage associated with lighting during construction and other construction activities necessitating electrical power is not easily quantifiable. Such electricity demand would be nominal and temporary and would cease upon the completion of construction.*

Source: Eyestone Environmental, 2015. Calculation worksheets are provided in Appendix S of this Addendum.

consumed during Modified Project construction. While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of construction. Consistent with the conclusions in the Certified EIR, energy demands during Modified Project construction would be typical of construction projects of similar types and sizes, and would not necessitate additional energy facilities or distribution infrastructure. Thus, the Modified Project's consumption of electricity and transportation-fuel would continue to be temporary and typical of similarly sized construction projects. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.3, Public Utilities—Energy Conservation, of the Certified EIR), impacts with respect to construction-related energy demand would be less than significant under the Modified Project. No mitigation measures are required.

(ii) Operation

The Certified EIR determined that peak and average electricity and natural gas demand from the Project Site would not increase since average and maximum attendance levels at the Project Site under the Original Stadium Project would be substantially similar to existing conditions (i.e., operation of the Sports Arena). Therefore, the Certified EIR determined that existing electricity and natural gas infrastructure and supplies would be able to accommodate the Original Stadium Project's energy demand, and impacts related to energy would be less than significant. While impacts would be less than significant, the Certified EIR included mitigation measures to reflect LADWP-recommended energy efficiency features, which would further reduce impacts. As the Modified Project includes design changes to the proposed stadium, changes to the stadium's operational program, and additional construction associated with the Ancillary Uses, the Modified Project could result in additional energy consumption beyond levels analyzed in the Certified EIR. Accordingly, the analysis below presents an estimate of the operational-related energy consumption of the entire Modified Project, including the proposed stadium.

Operational impacts related to energy are assessed in terms of both peak daily consumption (in relation to infrastructure capacity) and annual consumption (in relation to supplies and overall energy efficiency). With regard to peak daily consumption, as is the case under the Original Stadium Project, the Modified Project would replace the existing Sports Arena with an MLS stadium with a permanent seating capacity of approximately 22,000 seats, which is within the historic peak attendance level of the Sports Arena (i.e., a maximum attendance of 55,132 attendees was recorded in 2009, as shown in Table II-3 in the Certified EIR). In addition, the Modified Project would implement energy conservation features under the Los Angeles Green Building Code that were not required when the Original Stadium Project was approved. Therefore, energy impacts with respect to the stadium portion of the Modified Project during a maximum activity day (i.e., event day) would not represent a substantial increase in energy consumption compared to existing conditions, consistent with the Certified EIR's analysis.

However, additional event-day electricity and natural gas consumption beyond levels analyzed in the Certified EIR would result from concurrent operation of the Ancillary Uses proposed as part of the Modified Project. Although the estimated electricity and natural gas consumption of the stadium would not change compared to levels analyzed under the Certified EIR, for informational purposes, this analysis presents the estimated peak daily electricity and natural gas consumption of the entire Modified Project, including the stadium component, on an event day.

As shown in Table 29 and Table 30 on pages 200 and 201, the Modified Project's total estimated electricity demand on an event day would be approximately

Table 29
Modified Project Event Day Electricity Consumption

Facility Description	Quantity	Consumption Rate (kWh/unit/year)[a]	Total Average (kWh/day)[b]
Original Stadium Project Uses			
Stadium	253,400 gsf	53.30[c,d]	37,003
Additional Ancillary Uses Under Modified Project			
Conference Facilities	10,000 gsf	10.5[e]	288
Museum	40,000 gsf	10.5[e]	1,151
Team Store and Other Retail	30,000 gsf	13.55	1,114
Restaurant	14,000 gsf	47.45	1,820
Office	25,000 gsf	12.95	887
Subtotal Additional Uses			*5,260*
Total Modified Project Demand—Event Day (Stadium and Ancillary Uses)			**42,263**

gsf = gross square feet

[a] *Usage Factors are based on Table A9-11-A of SCAQMD CEQA Air Quality Handbook, April 1993.*

[b] *Annual consumption/365 days per year.*

[c] *Based on the Infrastructure Report included in Appendix R of this Addendum. Uses higher "event day" consumption rate for stadium as the stadium would consume more electricity on event days compared to non-event days.*

[d] *Corresponding rate not available for this land use. Therefore, the highest rate, "Food Store," was applied.*

[e] *Corresponding rate not available for this land use. Therefore, the "Miscellaneous" rate was applied.*

Source: Langan Engineering and Environmental Services, Inc., 2015.

42,263 kilowatt-hours (kWH), of which 37,003 kWh would be associated with the stadium and 5,260 kWh would be associated with the proposed Ancillary Uses. The Modified Project's total estimated natural gas demand on an event day would be approximately 140 therms[109] per day, of which 16 therms would be associated with the outdoor stadium and 124 therms would be associated with the proposed Ancillary Uses. To provide a conservative analysis, these estimates are based on gross square footage (rather than floor area). Furthermore, they conservatively do not account for implementation of the energy conservation features discussed below.

[109] *1 Therm = 100,000 British thermal units (Btu) = 100 cubic foot (sf).*

Table 30
Modified Project Event Day Natural Gas Consumption

Facility Description	Quantity	Consumption Rate (therms/sf/year)[a]	Total Average (therms/day)[b]
Original Stadium Project Uses			
Stadium	25,340 gsf[c]	0.23	16
Additional Ancillary Uses Under Modified Project			
Conference Facilities[d]	10,000 gsf	0.23	6
Museum[d]	40,000 gsf	0.23	25
Team Store and Other Retail	30,000 gsf	0.05	4
Restaurant	14,000 gsf	2.10	81
Office	25,000 gsf	0.11	8
Subtotal Additional Uses			*124*
Total Modified Project Demand—Event Day (Stadium and Ancillary Uses)			**140**

gsf = gross square feet

[a] *Usage Factors are based on Table 8-5 of California Commercial End-Use Survey, March 2006. 1 Therm = 100,000 Btu = 100 cubic foot.*

[b] *Annual consumption/365 days per year.*

[c] *Based on the Infrastructure Report included in Appendix R of this Addendum. Assumes 10 percent of stadium consumes gas (typical of open-air sports arenas).*

[d] *Corresponding rate not available for this land use. Therefore, the "Miscellaneous" rate was applied.*

Source: Langan Engineering and Environmental Services, Inc., 2015.

According to the Infrastructure Report, off-site electrical and natural gas service is available for the Project Site, and LADWP and SCG have confirmed that existing infrastructure has adequate capacity to serve the peak demand of the Modified Project (see Appendix R, Infrastructure Report). As stated in the Certified EIR, depending on the exact location and size of the requested services (to be determined as site plans are finalized), the Applicant may be financially responsible for some on-site infrastructure improvements. Such improvements may include installation of meters and/or service lateral connections, or the relocation of service laterals or the undergrounding of power lines necessary to serve the Project Site. Therefore, consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.3, Public Utilities—Energy Conservation, of the Certified EIR), impacts with respect to electricity and natural gas infrastructure would be less than significant under the Modified Project. No mitigation measures are required.

While the stadium's energy demand on an event day would be substantially the same as that of the Original Stadium Project (i.e., comparable or less than existing event-

day demand under the Sports Arena), the number of events held at the stadium on an annual basis could increase under the Modified Project as compared to levels projected under the Original Stadium Project. As shown in Table II-2 and Table II-3 in Section II, Project Description, of the Certified EIR, the existing Sports Arena hosts an average of 69 events a year (29 weekday events and 40 weekend events). Based on the programming proposed for the Modified Project, up to 88 stadium events could occur each year. In addition, the proposed Ancillary Uses would be operational up to seven days a week. Therefore, the following analysis estimates the annual operational energy consumption for the entire Modified Project to assess (1) whether adequate energy supplies are available to serve the Modified Project, and (2) the extent to which the Modified Project would incorporate energy conservation features to avoid wasteful, inefficient, and unnecessary consumption of energy. In accordance with Appendix F of the CEQA Guidelines, the estimate of the Modified Project's annual energy consumption includes estimated transportation energy consumption.

As shown in Table 31 on page 203, a total of approximately 5,019,673kWh of electricity, approximately 50,978 therms of natural gas, approximately 1,057,248 gallons of gasoline, and approximately 180,542 gallons of diesel fuel would be consumed annually during Modified Project operation. The annual electricity and natural gas shown in Table 31, reflects the Modified Project's consumption of electricity and natural gas after implementation of project design features, regulatory requirements, and mitigation measures, which are provided below. The Modified Project would comply with the required measures of the 2013 Los Angeles Green Building Code and implement additional efficiency measures to achieve a reduction in energy consumption that is greater than 25 percent relative to the ASHRAE 90.1-2007 standard, but no less than minimum compliance with the 2013 California energy efficiency standards (Title 24, Part 6). The 2013 CALGreen Code (applicable to the Modified Project) is anticipated to be 30 percent more efficient than the 2008 Title 24 (applicable to the Original Stadium Project) for nonresidential construction.[110] Therefore, while the Modified Project would represent an increase in annual energy consumption over existing conditions with the Sports Arena due to the additional number of events and proposed Ancillary Uses, the Modified Project would be more energy efficient than both the Sports Arena and the Original Stadium Project. With regard to transportation energy consumption, the gasoline and diesel fuel usage estimates provided reflect internalization and the use of transit by people visiting the Project Site. In particular, the Expo Light Rail Line had not been completed when the

[110] *California Energy Commission, Energy Commission Approves More Efficient Buildings for California's Future, May 31, 2012, www.energy.ca.gov/releases/2012_releases/2012-05-31_energy_commission_approves_more_efficient_buildings_nr.html, accessed August 10, 2015.*

Table 31
Summary of Annual Energy Use During Modified Project Operation

	Unit	Existing Sports Arena[a]	Modified Project Without Project Features[b,c]	Modified Project With Project Features	Percent Reduction from Project Features	Net Annual Energy Use
Electricity						
Electricity (building)	kWh/Year	2,207,477	6,012,376	4,809,901	-20%	2,602,424
Electricity (water)	kWh/Year	41,242	239,793	209,772	-13%	168,530
Total Electricity	kWh/Year	2,248,719	6,252,169	5,019,673	-20%	2,770,954
Natural Gas	Therms	48,316	50,978	50,978	0%	2,662
Mobile						
Gasoline	Gallons	277,274	1,464,954	1,057,248	-28%	779,974
Diesel	Gallons	47,349	250,164	180,542	-28%	133,193

[a] *Assumes 69 events per year, consistent with the Certified EIR.*
[b] *Based on the Infrastructure Report included in Appendix R of this Addendum.*
[c] *Assumes 88 events per year, pursuant to the Modified Project program.*
Source: Eyestone Environmental, 2015. Calculation worksheets are provided in Appendix S of this Addendum.

Original Stadium Project was analyzed in the Certified EIR. This rail line now provides substantial access to the Project vicinity via public transit and provides a substantial source of conservation of transportation energy. As shown in Table 31 on page 203, the Modified Project's conservation features would result in a reduction of energy use of 12 to 20 percent. Therefore, the Modified Project would not result in the wasteful, inefficient, or unnecessary consumption of energy.

With respect to energy supplies, the Modified Project would result in a net increase in 2,770,954 kWh/year in electricity consumption when accounting for the removal of the existing Sports Arena. Based on LADWP's 2014 Power Integrated Resource Plan, LADWP forecasts that its total energy sales in 2018 (the Modified Project's buildout year) will be 22,807 gigawatt-hours (GWh) of electricity.[111,112] As such, the Modified Project-related net increase in annual electricity consumption of 2,770,954 kWh/year would represent approximately 0.01 percent of LADWP's projected sales (i.e., supplies) in 2018. Therefore, it is anticipated that LADWP's existing and planned electricity supplies would be sufficient to support the Modified Project's electricity demand. Impacts would be less than significant and no mitigation is required.

As stated above, the Modified Project's estimated net increase in annual gas consumption is 50,978 therms. Based on the California Energy Commission's staff demand forecast for the 2014–2024 period, annual natural gas supply within SoCalGas's service area is estimated to be approximately 7,161 million therms in 2018. [113,114] Therefore, the Modified Project would account for approximately 0.001 percent of the 2018 forecasted consumption in SCG's planning area. Therefore, it is anticipated that SCG's existing and planned natural gas supplies would be sufficient to support the Modified Project's net increase in demand for natural gas. Impacts would be less than significant and no mitigation is required.

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[111] *LADWP defines its future electricity supplies in terms of sales that will be realized at the meter.*

[112] *LADWP, 2014 Power Integrated Resource Plan, Appendix A, Table A-1, www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=10f8usiiei_38&_afrLoop=1466297694517747, accessed August 5, 2015.*

[113] *Demand was interpolated between 2015 and 2020 estimates.*

[114] *The California Energy Commission's forecast includes three scenarios: a high energy demand case, a low energy demand case, and a mid energy demand case. The consumption forecast for the low energy demand case is used in this calculation to provide a conservative analysis of the Project (i.e., the Project would represent a greater percentage of overall demand under this scenario). California Energy Commission, Commission Final Report, California Energy Demand 2014–2024 Final Forecast, January 2014, p. 63, www.energy.ca.gov/2013publications/CEC-200-2013-004/CEC-200-2013-004-V1-CMF.pdf, accessed August 12, 2015.*

Based on the analysis above, and consistent with the conclusions in the Certified EIR for the Original Stadium Project (refer to Section IV.I.3, Public Utilities—Energy Conservation, of the Certified EIR), impacts with respect to operational-related energy demand would be less than significant under the Modified Project. Accordingly, the Modified Project would not result in any new significant impacts with respect to operational-related energy demand, and it would not substantially increase the severity of any significant impacts previously identified in the Certified EIR.

(iii) Project Design Features and Mitigation Measures

The Modified Project would incorporate sustainability as part of its key design and operation criteria. In so doing, the Modified Project would comply with Title 24 of the California Code of Regulations, including Part 6 (Energy Efficiency Standards for Residential and Nonresidential Buildings) and Part 11 (California Green Building Standards Code, commonly referred to as the CALGreen Code), as well as the City of Los Angeles Green Building Code (2013), which incorporates the CALGreen Code into Chapter IX of the LAMC, in effect at the time of the Modified Project's permit application. The Modified Project would also be designed to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-BD+C or LEED-ND Rating System (v.3), or equivalent green building standards.

The Modified Project would also implement the following Project Design Features related to energy conservation:

PDF P-4: The Modified Project shall explore the feasibility of additional energy efficiency options as applicable to demonstrate compliance with AIA2030 challenge goal of 60-percent reduction from the 2003 Commercial Building Energy Consumption Standard (CBECS) for "Public Assembly—Recreation" facilities. The CBECS baseline for similar building types is 65 kBtu/sf. In order to achieve a 60-percent reduction the Modified Project shall investigate setting an energy consumption goal of 26 kBtu/sf.

PDF P-5: The Modified Project shall explore the feasibility of achieving a 10-percent reduction in energy use below the 2013 California energy efficiency standards (Title 24, Part 6). In so doing, the Modified Project shall register for the savings of the design program.

The following mitigation measures were included in the Certified EIR to further reduce the Original Stadium Project's less-than-significant impacts with respect to energy. These mitigation measures would continue to be implemented as part of the Modified Project and has been incorporated into the MMP for the Modified Project included in

Appendix A of this Addendum, but have been revised as follows to reflect current City conservation requirements:

EIR Mitigation Measure MM I.3-1: Built-in appliances, refrigerators, and space-conditioning equipment shall exceed the minimum efficiency levels mandated in the California Code of Regulations.

EIR Mitigation Measure MM I.3-2: The ~~Project~~ Applicant shall install high-efficiency air conditioning controlled by a computerized energy-management system in the office and retail spaces that provides the following:

- A variable air-volume system that results in minimum energy consumption and avoid hot water energy consumption for terminal reheat;
- A 100-percent outdoor air-economizer cycle to obtain free cooling in appropriate climate zones during dry climatic periods;
- Sequentially staged operation of air conditioning equipment in accordance with building demands; ~~and~~
- The isolation of air conditioning to any selected floor to floors; and
- Where feasible, reduce building conditioning load by reducing the amount of conditioned building area.

EIR Mitigation Measure MM I.3-3: The ~~project~~ Proposed Project shall be designed in a manner that utilizes Cascade (i.e., passively transferred) ventilation air from high-priority areas before exhausted, thereby decreasing the volume of ventilation air required. For example, air could be passively transferred from occupied space to corridors then to mechanical spaces before being exhausted.

EIR Mitigation Measure MM I.3-4: The Applicant shall incorporate a recycle lighting system heat for space heating during cool weather. Exhaust lighting-system heat from buildings, via ceiling plenum, shall be used to reduce cooling loads in warm weather.

EIR Mitigation Measure MM I.3-5: The Applicant shall install low and medium static-pressure terminal units and ductwork to reduce energy consumption by air-distribution systems.

EIR Mitigation Measure MM I.3-6: The Applicant shall ensure that buildings are well sealed to prevent outside air from infiltrating and increasing interior space-conditioning loads. ~~Where applicable, building entrances shall be designed with vestibules to restrict infiltration of unconditioned air and exhausting of conditioned air.~~

EIR Mitigation Measure MM I.3-7: The Applicant shall conduct a performance check of the installed space-conditioning system prior to the

issuance of the certificate of occupancy to ensure that energy-efficiency measures incorporated into the Project operate as designed.

EIR Mitigation Measure MM I.3-8: Exterior walls shall be finished with light-colored materials and high-emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light-colored materials to reflect more light and, thus, increase lighting efficiency.

EIR Mitigation Measure MM I.3-9: White, high albedo, and reflective material shall be used for roofing in order to meet California standards for reflectivity and emissivity to reject heat, and be Energy Star rated.

EIR Mitigation Measure MM I.3-10: Thermal insulation that exceeds requirements established by the California Code of Regulations shall be installed in walls and ceilings in accordance with the following specifications as feasible:

- Exterior walls abutting to conditioned spaces: R-60
- Roof areas abutting conditioned spaces: R-80[115]

EIR Mitigation Measure MM I.3-11: Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.

EIR Mitigation Measure MM I.3-12: The ~~Project~~ Applicant shall install heating-rejecting window treatments, such as films, blinds, draperies, or other on appropriate exposures.

EIR Mitigation Measure MM I.3-13: The ~~Project~~ Applicant shall install light-emitting diode (LED), fluorescent, and high-intensity-discharge (HID) lamps, which give the highest light output per watt of electricity consumed, wherever possible including all street and parking lot lighting to reduce electricity consumption. Reflectors shall be used to direct maximum levels of light to work surfaces.

EIR Mitigation Measure MM I.3-14: The ~~Project~~ Applicant shall install photosensitive controls and dimmable electronic ballasts to maximize the use of natural daylight available and reduce artificial lighting load.

EIR Mitigation Measure MM I.3-15: The ~~Project~~ Applicant shall install occupant-controlled light switches and thermostats to permit individual adjustment of lighting, heating, and cooling to avoid unnecessary energy consumption

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[115] *Insulation is rated in terms of thermal resistance, called R-value, which indicates the resistance to heat flow. The higher the R-value, the greater the insulating effectiveness. The R-value of thermal insulation depends on the type of material, its thickness, and its density.*

EIR Mitigation Measure MM I.3-16: The ~~Project~~ Applicant shall install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.

EIR Mitigation Measure MM I.3-17: Mechanical systems (HVAC) and lighting building shall be controlled with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied space.

EIR Mitigation Measure MM I.3-18: The ~~Project~~ Applicant shall incorporate windowless walls or passive solar inset of windows into the Project for appropriate exposures.

EIR Mitigation Measure MM I.3-19: Design Project shall focus pedestrian activity within sheltered outdoor areas.

Q. Cumulative Impacts

CEQA requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts."[116] This analysis of cumulative impacts need not be as in-depth as what is performed relative to the project, but instead is to "be guided by the standards of practicality and reasonableness."[117]

The Certified EIR analyzed the potential cumulative impacts of the Original Stadium Project (see Section IV.K, Cumulative Impacts, in the Certified EIR). The Certified EIR's analysis of cumulative impacts was based on a list of individual related projects in the Project Site area that were known at the time the Certified EIR was prepared (see Table IV.K-1 on page IV.K-2 of the Certified EIR). The Certified EIR analysis concluded that the Original Stadium Project would result in significant and unavoidable cumulative impacts with respect to construction-related air quality, and less than significant cumulative impacts with respect to aesthetics, operational air quality, GHG emissions, historic resources, land use, noise, fire protection, wastewater, water, electricity, natural gas, solid waste, parking, and traffic. Cumulative impacts with respect to agriculture and forestry resources, biological resources, archaeological and paleontological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, mineral resources, population/housing/employment, police services, schools, parks and recreational facilities, libraries, and construction traffic were not assessed in detail in the Certified EIR.

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[116] *State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.*

[117] *Ibid, § 15355.*

An updated list of related projects in the Project Site vicinity is provided in Table 4 in the Modified Project Transportation Report included in Appendix P-1 of this Addendum. As the following analysis indicates, the Modified Project would not result in new significant cumulative impacts or increase the severity of significant cumulative impacts that were previously evaluated and disclosed in the Certified EIR. Therefore, no further environmental analysis of the Modified Project's cumulative impacts is necessary.

- *Aesthetics*—Impacts to aesthetics resources have the potential to be cumulatively considerable if a project's development in conjunction with related project development were to substantially block existing views of visual resources or negatively alter the visual character of the area. As analyzed above, views of visual resources would not be significantly impacted by the Modified Project. In addition, new buildings constructed as part of the Modified Project would be compatible with existing buildings within the Project Site vicinity. The two nearest related projects are located in the northeastern portion of Exposition Park at the California African American Museum and the California Science Center. Due to the distance between these sites and the Project Site, as well as intervening landscape, the extent to which these related projects may be visible within viewsheds of the Project Site is anticipated to be minimal. Furthermore, as expansions of the existing museums, these related projects would be designed to be compatible with the existing California African American Museum and the California Science Center structures. No other related projects are immediately adjacent to or within the Modified Project's primary viewsheds. Accordingly, none of the related projects when viewed with the Modified Project would have the potential to adversely affect views or the visual character of the area. Further, through the environmental review and/or plan check processes, related projects would be reviewed on a case-by-case basis by the City and/or Coliseum Commission to ensure that they comply with applicable LAMC requirements regarding building heights, setbacks, massing, and lighting. Thus, consistent with the Certified EIR analysis, cumulative impacts associated with aesthetics would be less than significant.

- *Agriculture and Forestry Resources*—The Project Site area is highly urbanized and no agricultural or forestry lands or uses exist. Implementation of the Modified Project and related projects in the Project Site vicinity would not convert farmland to non-agricultural use or result in the loss of forest land. Thus, no cumulative impacts related to agricultural resources or forestry resources would occur.

- *Air Quality*—As stated in the Certified EIR, according to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As discussed above, impacts with respect to regional air emissions during construction would be significant and unavoidable under the Modified Project,

albeit less than levels analyzed in the Certified EIR. Therefore, consistent with the analysis in the Certified EIR for the Original Stadium Project, cumulative impacts related to construction air quality would be significant and unavoidable under the Modified Project. However, the Modified Project's contribution to cumulative impacts would be reduced compared to that of the Original Stadium Project.

As stated in the Certified EIR, according to SCAQMD methodology for assessing cumulative operational impact, if an individual project results in air emissions of criteria pollutants that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the region is in non-attainment under an applicable federal or State ambient air quality standard. As discussed above, operational air quality impacts under the Modified Project would be less than significant at the project level. Therefore, consistent with the Certified EIR analysis for the Original Stadium Project, cumulative impacts would be less than significant under the Modified Project.

- *Biological Resources*—As discussed above, the Modified Project would result in less-than-significant impacts associated with biological resources. The Project Site vicinity is highly urbanized and no special status species, wetlands, or habitats supporting such resources are located in the Project Site vicinity. Therefore, it is not anticipated any of the related projects in the Project Site vicinity would significantly impact biological resources. Related projects would also be required to comply with both the City of Los Angeles' Protected Tree Ordinance, as well as the provisions of the Street Tree Ordinance and the Migratory Bird Treaty Act. Thus, cumulative impacts related to biological resources would be less than significant.

- *Cultural Resources*—The Project Site vicinity is located within an urbanized area that has been substantially disrupted over time. In the event that archaeological and/or paleontological resources are uncovered, each related project would be required to comply with regulatory requirements. In addition, as part of the environmental review processes for the related projects, it is expected that mitigation measures would be established as necessary to address the potential for uncovering of archeological and paleontological resources. Thus, the Modified Project would not contribute to any cumulative impacts associated with archaeological or paleontological resources.

  With regard to historic resources, as discussed above, like the Original Stadium Project, the Modified Project would result in significant and unavoidable project-related impacts to historic resources due to the demolition of the existing Sports Arena. Impacts on the adjacent Coliseum would be less than significant because the Modified Project has been designed in a manner so as not to interfere with the historical integrity of the Coliseum. Impacts to historic resources are generally site-specific, and related to the proximity of a given project to an

identified historic resource. As previously discussed, the two nearest related projects are located in the northeastern portion of Exposition Park at the California African American Museum and the California Science Center. Due to the distance between these sites and the Project Site, as well as intervening landscape, the extent to which these related projects may be visible within viewsheds of the Project Site, as well as viewsheds of the Project Site and the Coliseum, is anticipated to be minimal. Furthermore, as expansions of the existing museums, these related projects would be designed to be compatible with the existing California African American Museum and the California Science Center structures, as well as the Coliseum and other identified historic resources within Exposition Park. Additionally, these related projects do not involve historic resources that are significant within the same historic context as the Sports Arena. Therefore, consistent with the Certified EIR analysis for the Original Stadium Project, cumulative impacts to historic resources would be less than significant.

- *Geology and Soils*—Due to their site-specific nature, geology impacts are typically assessed on a project-by-project basis for a particular localized area. Cumulative development has the potential to expose a greater number of people to seismic hazards, depending on the geologic conditions in a given area. As discussed above, the Project Site is generally flat in nature, does not contain known active faults, and is not within a mapped liquefaction potential investigation zone, mapped landslide area, or Methane Zone. It is therefore expected that related projects in the immediate vicinity of the Project Site would have similar geologic conditions, such that cumulative development would not have the potential to impose substantial safety risks to people, structures or infrastructure. However, as with the Modified Project, related projects would be subject to local, State, and federal regulations and standards for seismic safety to ensure potential impacts would be avoided. Thus, cumulative impacts related to geology and soils would be less than significant.

- *Greenhouse Gas Emissions*—As evaluated above, the Modified Project would not result in significant greenhouse gas emissions. Further, the analysis of greenhouse gas emissions is cumulative in nature. Thus, the Modified Project would not result in significant cumulatively considerable impacts associated with greenhouse gas emissions, consistent with the Certified EIR analysis for the Original Project. Cumulative impacts would be less than significant.

- *Hazards and Hazardous Materials*—As with the Modified Project, all related development located within the vicinity of the Project Site would be subject to local, regional, State, and federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, development of the Modified Project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

- *Hydrology and Water Quality*—Related projects could potentially result in an increase in surface water runoff and contribute point and non-point source pollutants to nearby water bodies. However, as with the Modified Project, related projects would be subject to NPDES permit requirements for both construction and operation, including development of SWPPPs for construction projects greater than 1 acre, compliance with SUSMP requirements during operation and compliance with other local requirements pertaining to hydrology and surface water quality. It is anticipated that related projects would be evaluated on an individual basis by City of Los Angeles Department of Public Works to determine appropriate BMPs and treatment measures to avoid significant impacts to hydrology and surface water quality. Furthermore, as discussed above, the Modified Project would not increase runoff from the Project Site as compared to existing conditions or provide for uses that generate substantial pollutants. Therefore, the Modified Project's hydrology/water quality impacts would not be cumulatively considerable, and cumulative impacts related to hydrology/water quality would be less than significant.

- *Land Use and Planning*—As with the Modified Project, related projects would be reviewed on a case-by-case basis to ensure consistency with existing land use policies and regulations. Where inconsistencies occur, it is anticipated that appropriate actions would be undertaken to ensure that land use impacts would be less than significant. Furthermore, no related projects that could cause land use incompatibility are known to be located within Exposition Park or in the immediate vicinity of the Project Site. Thus, consistent with the Certified EIR analysis for the Original Stadium Project, cumulative land use impacts would be less than significant.

- *Mineral Resources*—As the Project Site is not located within a mineral producing area, the Modified Project would not result in the loss of a locally-important mineral resource recovery site. Furthermore, no mineral resources or extraction operations for such resources occur in the Project Site vicinity. Therefore, cumulative impacts associated with the loss of mineral resources would not occur.

- *Noise*—Short-term cumulative construction-noise impacts in the immediate vicinity of the Project Site could occur if related projects in close proximity to the Project Site are under construction during the same time period as the Modified Project. As stated above, impacts with respect to construction noise would continue be significant and unavoidable under the Modified Project, consistent with the Certified EIR's analysis of the Original Stadium Project. However, based on the distance between the related projects the Project Site and the presence of existing intervening structures, construction noise from the related projects would not be anticipated to combine with that of the Modified Project to a measureable extent. Furthermore, related projects would be required to comply with LAMC requirements related to construction noise, including limitations on hours when construction and demolition activities are allowed to occur, and would be

required to mitigate construction noise to the extent feasible pursuant to CEQA. Therefore, consistent with the Certified EIR analysis for the Modified Project, cumulative construction noise impacts would be less than significant.

As discussed above, impacts with respect to operational stadium event noise (i.e., related to concerts, crowd noise including yelling and cheering, a public address system, amplified music, and announcements) would continue be significant and unavoidable under the Modified Project, consistent with the Certified EIR's analysis of the Original Stadium Project. The two nearest related projects are located in the northeastern portion of Exposition Park at the California African American Museum and the California Science Center. These projects involve interior expansions of the existing museum facilities, and are not anticipated to result in large, outdoor events that would occur simultaneously with events at the Project Site. Based on the distance between the related projects the Project Site and the presence of existing intervening structures, noise from outdoor crowds would not be anticipated to combine to result in significant cumulative impacts. Furthermore, the Applicant would coordinate with the California African American Museum and the California Science Center regarding the scheduling of events to minimize noise, traffic, and parking impacts to the extent feasible. Additionally, as described above, under existing conditions the Coliseum currently hosts outdoor events with approximately 93,000 attendees. Pursuant to Mitigation Measure J-1 in the Certified EIR, the Coliseum Commission is required to schedule events at the Coliseum and Sports Arena in such a manner that the event attendance size at the two venues combined does not exceed 93,000 people. Accordingly, noise from operations of the Modified Project in combination with noise from events at the Coliseum is not anticipated to result in a substantial increase above existing conditions. Further, the analysis of operational noise impacts in Section IV.L, Noise, on page 119 of this Addendum, which concluded that operational noise impacts associated with traffic would be less than significant, considers future traffic levels and is therefore cumulative by nature. Therefore, consistent with the Certified EIR analysis for the Modified Project, cumulative operational noise impacts would be less than significant.

- *Population/Housing/Employment*—As discussed above, no residential population or housing units would be introduced by the Modified Project. In addition, the Project Site is located in an urbanized area with infrastructure that is already in place. Thus, the Modified Project would not induce substantial population growth or displace substantial numbers of people, and the Modified Project's impacts to population and housing would not be cumulatively considerable. In addition, while related projects would cumulatively increase population in the area, such increases are expected to be within City and SCAG growth forecasts. Thus, cumulative impacts associated with population and housing would be less than significant.

- *Public Services*—Development of the Modified Project in conjunction with related projects would cumulatively increase the demand for fire services. However, as discussed above, all three fire stations serving the Project Site area are achieving response times that are less than the Citywide average, and therefore can accommodate additional demand. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Modified Project and related projects would contribute. Moreover, all of the related project's plans would be reviewed by the LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with LAFD requirements and LAMC requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be below a level of significance. Therefore, consistent with the Certified EIR analysis for the Modified Project, cumulative impacts to fire protection would be less than significant.

  Development of the Modified Project in conjunction with related projects would also cumulatively increase the demand for police services. As discussed above, the Certified EIR determined that the Original Stadium Project's potential impacts to police services would be less than significant, and since the Certified EIR was approved the officer-to-resident ratio and staffing levels at the Southwest Area Police Station have improved and violent crimes and property crimes in the area have decreased. Therefore, while the Southwest Area Police Station can accommodate additional demand from cumulative development, the LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, the LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes) to which the Modified Project and related projects would contribute. Moreover, it is anticipated that related projects would be reviewed by the LAPD to ensure that sufficient security measures would be implemented to reduce potential impacts to police protection services. Furthermore, given the Modified Project's proposed security design features, the Modified Project's contribution to cumulative impacts to police protection would not be cumulatively considerable and would be less than significant.

  As discussed above, payment of developer impact fees in accordance with Senate Bill 50 and pursuant to Section 65995 of the California Government Code

would ensure that the impacts of the Modified Project on school facilities would be less than significant. Related projects would also be required to pay the developer impact fee. As also discussed above, the Modified Project would not result in a significant impact on library services and facilities. In addition, much of the growth associated with the Modified Project and related projects is already accounted for in the service population projections made by the LAPL. Therefore, the Modified Project would not contribute to a cumulatively considerable impact with regard to schools and libraries. Cumulative impacts would be less than significant.

- *Recreation*—The Modified Project does not include residential uses that generate a direct need for recreational services. Furthermore, related projects would be required to provide open space and recreational amenities or comply with the parks and open space requirements established by the LAMC. Finally, the Modified Project is providing approximately 143,000 square feet of improved public open space within Exposition Park, which will provide new open space amenities for area residents, including new residents associated with related projects. Thus, cumulative impacts with respect to recreation would be less than significant.

- *Traffic*—As discussed in Section IV.O, Traffic/Transportation/Parking on page 149 of this Addendum, cumulative traffic impacts of the Modified Project in conjunction with related projects would be less than significant.

- *Water and Wastewater*—Due to shared urban infrastructure, the Modified Project and related projects would cumulatively increase wastewater generation and water consumption. However, utility system capacity must be demonstrated during the approval process for each related project. As the service providers conduct ongoing evaluations to ensure that facilities are adequate to serve the forecasted growth of the community, cumulative impacts on utilities are concluded to be less than significant. Furthermore, the Modified Project's increase in average daily wastewater flow would represent approximately 0.02 percent of the current remaining available capacity of the Hyperion Treatment Plant, and the estimated net increase in water demand would comprise less than 0.008 percent of the water demand for the City in 2018. Therefore, the Modified Project's impacts with respect to wastewater treatment capacity and water supply would not be cumulatively considerable, and cumulative impacts would be less than significant.

- *Solid Waste*—The Modified Project in conjunction with related projects would increase the need for solid waste disposal during their respective construction periods. However, since unclassified landfills in the County do not generally have capacity concerns, inert landfills serving the related projects would have sufficient capacity to accommodate construction waste disposal needs. With regard to operational waste disposal needs, the Modified Project's estimated increase in solid waste generation would represent approximately 0.0004 percent

of the total combined remaining disposal capacity for the Class III landfills that accept municipal solid waste generated within the City of Los Angeles. Furthermore, the County of Los Angeles conducts ongoing evaluations to ensure that landfill capacity is adequate to serve the forecasted disposal needs of the region. Therefore, the Modified Project's impacts with respect to solid waste would not be cumulatively considerable, and cumulative impacts would be less than significant.

- *Energy*—Development of the Modified Project and related projects would increase the use of electricity and natural gas. Nevertheless, as required by the City Building Code, the Modified Project and all related projects would incorporate Title 24 Energy Efficiency Standards into their project design. In addition, new buildings would be subject to the requirements of the City's Green Building Ordinance which incorporates CALGreen requirements. Therefore, the Modified Project and related projects would achieve the highest standards of energy efficiency mandated by applicable regulations. Furthermore, as discussed above, the net increase in electricity and natural gas usage associated with the Modified Project would represent approximately 0.01 percent of LADWP's projected sales (i.e., supplies) in 2018 and approximately 0.001 percent of the 2018 forecasted consumption in SCG's planning area, respectively. Therefore, the Modified Project's impacts with respect to energy would not be cumulatively considerable, and cumulative impacts would be less than significant.

V. Conclusion

As demonstrated by the discussion above, all of the potential environmental impacts associated with the Modified Project would be within the envelope of impacts already evaluated in the Certified EIR for the Original Stadium Project. Therefore, the Modified Project would not result in new significant impacts or increase the severity of significant impacts that were previously evaluated and disclosed in the Certified EIR. Therefore, no further environmental analysis of the Modified Project is necessary. A revised MMP containing all Project Design Features and Mitigation Measures applicable to the Modified Project, including applicable mitigation measures from the Certified EIR analysis, is included as Appendix A to this Addendum.